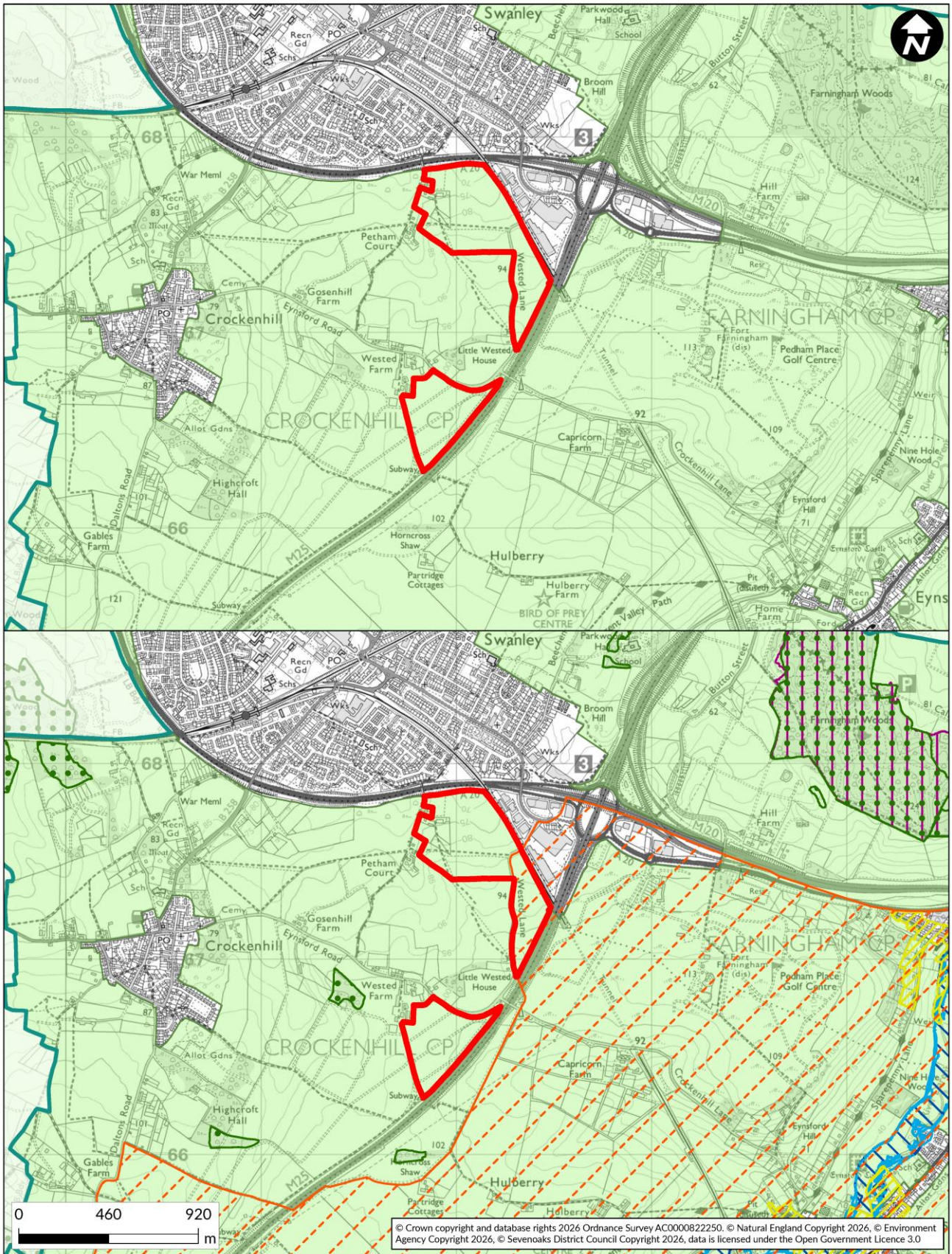


EM/24/00001
Petham Court Farm



SITE DETAILS	
SHELAA Reference	EM/24/00001
Regulation 18 (2025) Reference	SWAN17
Site Area (Ha)	38.01
Developable Area (Ha)	38.01
Brownfield / Greenfield	Mixed
Planning History	None relevant
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site in Crockenhill parish, adjacent to the urban confines of Swanley. The site comprises agricultural land and is bounded by the A20 to the north and the M25 and railway line to the north-east. Beyond the railway line, the site is adjacent to an area of employment land. To the south and west, the site is bounded by agricultural land and open countryside. There are a few small clusters of dwellings to north-west and south-west, as well as allotments in the north-western corner of the site.
Site Type	New build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Swanley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes, but not allocated (allotments – 3.47%)	
Existing allocation / designation	No existing allocation/designation	
Proposed use / designation	Yes – emerging open space designation (allotments – 3.47%)	
Green Belt	In the Green Belt (adjacent to urban confines of Swanley)	
Green Belt Stage 3	Partly provisional grey belt	
Footnote 7 Constraints	Presence of Footnote 7 Constraints – significant impacts	
National Landscape	Partially within Kent Downs National Landscape (19.43%)	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 3 – 77.79% Grade 2 – 22.21%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within or adjacent to SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within or adjacent to Local Wildlife Site	
Local Nature Reserve	Not within or adjacent to Local Nature Reserve	
Ancient Woodland	Not within or adjacent to ancient woodland	
Presence of Heritage Assets	Within 200m of 3 listed buildings	
Contamination Issues	Contaminated land assessment required	
Noise Pollution	Noise impact assessment required	
Air Quality	Air quality impact assessment required	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Requires new access arrangements	
Network Capacity	Limited capacity on transport network – requires improvements	
Settlement Classification	Adjacent to Swanley (400m buffer)	
Town and Local Centres	Within 800m of Swanley Manse Parade Within 1km of Swanley Town Centre	
Train Station	Over 2km from a railway station	

GREEN	AMBER	RED
13	10	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site lies partially within the Kent Downs National Landscape and would potentially result in major change in landscape character. <u>National Highways</u> The National Highways response sets out that the site is near the M25 J3 and would require new access points on the local road network. The Plan acknowledging further details would be needed to show how the proposal would be accommodated and how it would impact the SRN and local road network. <u>Transport for London</u> A response from Transport for London covering impact from this and the Pedham Place site notes the potential to impact the Transport for London Road Network and TFL bus route 233. The response also comments on the distance between to the nearest train stations, issues with bus services, and lack of active travel infrastructure. Bus route 233 would be considered for extension to the site with developer contribution. TFL note they should be consulted as part of an application. <u>Network Rail</u> Network Rail notes the proximity of the proposed stadium and mixed-use development to Swanley. They would be keen to engage with the site promoter early to identify opportunities to connect the development with Swanley rail station, to reduce impacts on the highway and promote sustainable modes of travel and improved means of access to the railway.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.

Town and Parish Councils	<u>Crockenhill Parish Council</u> Crockenhill Parish Council strongly objects to the inclusion of site SWAN17 (Land at Petham Court) and associated development. The Council argues that the scheme is speculative, lacks supporting evidence, a masterplan, transport assessments and clear viability, particularly given that Wasps no longer operates as a professional club and there has been little progress or engagement from the promoters. The Council considers the proposal inappropriate for a rural Green Belt location, citing significant impacts on the countryside, National Landscape, farmland, allotments, biodiversity, residential amenity and local character. It also raises major concerns about severe traffic and infrastructure pressures around the already congested M25 Junction 3 and surrounding road network. In the Council's view, there is no demonstrated need for the employment allocation, the site is not deliverable, and the proposal conflicts with both national planning policy and Local Plan policies EMP2 and HW3. It therefore requests that SWAN17 be removed from the Local Plan. <u>Eynsford Parish Council</u> Eynsford Parish Council strongly objects to the proposal at Petham Court (SWAN17), arguing that it is unsuitable for a rural Green Belt location and should be removed from the Local Plan. The Council cites concerns over landscape harm, loss of agricultural land and allotments, inadequate transport infrastructure, a lack of transport, noise and light impact assessments, and the absence of any proven need for a stadium in the area. The Council also believes the proposal would worsen congestion, pollution and impacts on local communities, while providing limited local benefits. It further questions the scheme's viability, arguing that there is no credible business case for a stadium of this scale in this location. <u>Swanley Town Council</u> Swanley Town Council strongly objects to the proposed economic use of the site, citing a lack of information on transport and infrastructure improvements and how significant impacts such as traffic, noise, light pollution and loss of amenity would be mitigated. They state that support would only be possible if the development delivered clear and exceptional regeneration and infrastructure benefits for Swanley, but no masterplan or meaningful engagement has been provided. Consequently, they oppose the site's inclusion in the Regulation 18 Local Plan.
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Other Consultation Bodies	<u>Kent Downs National Landscape</u> Kent Downs National Landscape has raised concerns that the proposed SWAN17 allocation lacks sufficient detail, particularly given its scale and sensitive location partly within and adjoining the Kent Downs National Landscape. It considers a Development Brief necessary and notes discrepancies between the site boundary shown in the Local Plan and that submitted by the promoters. While welcoming the exclusion of the National Landscape area from development, it states that there is currently insufficient information to assess the likely impacts of the proposed stadium, hotel and training facilities on the National Landscape and its setting. <u>CPRE Kent</u> CPRE Kent objects to the allocation of SWAN17 for a stadium and associated development, arguing that there is no evidence of need for a world-class rugby facility and that the proposal is unjustified under the Local Plan's own evidence base. It considers the site unsuitable due to its Green Belt location, impacts on the Kent Downs National Landscape, loss of high-quality agricultural land and wider countryside impacts. CPRE also questions the site's classification as employment land and warns that, if the stadium is not delivered, the allocation could enable other forms of commercial development.
General Response	Respondents highlight that Swanley's roads, junctions and parking cannot support a 28,000-seat stadium at Petham Court Farm and that public transport, walking and cycling links are inadequate for event crowds. They note the absence of transport modelling, impact assessments and mitigation plans, and highlight potential gridlock on the M25/A20 interchange, narrow rural lanes and congested bus services. Technical evidence on viability, market need, air quality, noise, landscape and ecological impacts is said to be lacking, with no exceptional circumstances for Green Belt release. Potential harm to farmland, allotments, biodiversity and rights of way is raised, as is the risk of urbanising the Kent Downs National Landscape. Concerns extend to event management, emergency access, utilities capacity and consultation shortcomings, with no clear strategies to address traffic, environmental or service provision impacts.
Key issues raised	Transport access and capacity (roads, junctions, parking) Technical evidence, viability and policy compliance Public transport, walking and cycling connectivity Biodiversity, farmland, allotments and right of way

	Landscape, Green Belt and national landscape setting Event-day management, crowd movement and emergency access Noise, light, litter and antisocial behaviour from events Air quality and public health Utilities and community services capacity
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SITE PROMOTER RESPONSE

Quod on behalf of Wasps Rugby Football Club

Wasps RFC supported the overall strategy of the Regulation 18 Local Plan, particularly the focus on Swanley as a growth and regeneration area and the release of grey belt land to meet development needs. It promotes the allocation of land west of the M25 (SWAN17) for a stadium-led mixed-use development comprising a stadium, training facilities, hotel, commercial uses, community facilities and around 150 homes, including retirement accommodation. The club argues that the scheme would deliver significant economic, social, sporting and regeneration benefits, including job creation, increased visitor spending, community programmes and enhanced sports provision. While supporting the allocation, Wasps seeks amendments to the Plan to provide greater flexibility, including recognising the residential element of the scheme, removing or relaxing restrictions on development within the National Landscape portion of the site, and deleting the reference to 11,000sqm floorspace in Policy EMP2 which they consider overly restrictive. They contend that the public benefits of the development could amount to very special circumstances capable of justifying Green Belt development and that detailed matters relating to landscape, design, transport and environmental impacts should be assessed through the planning application process rather than constrained by the Local Plan.

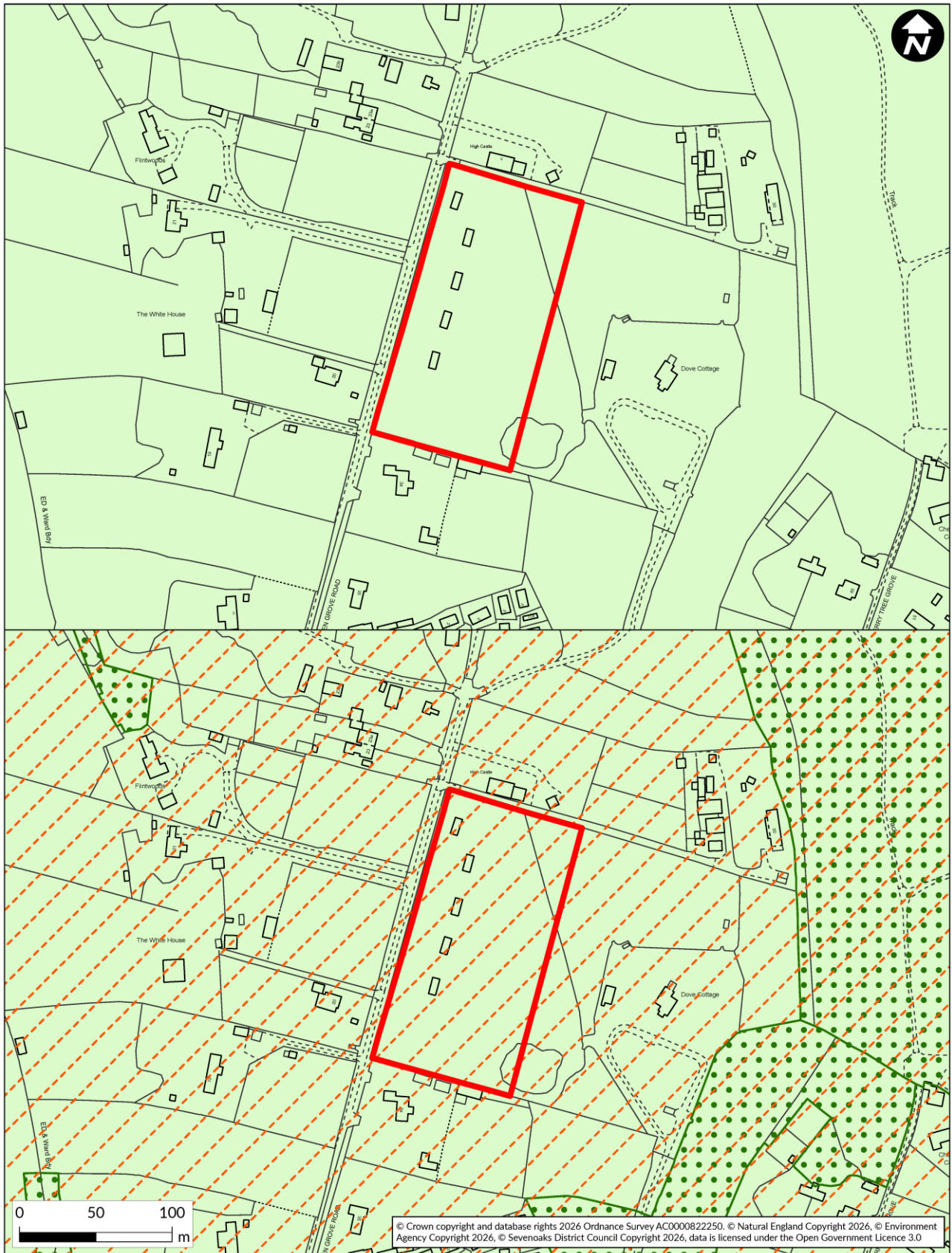
SHELAA 2026 CONCLUSIONS

Suitable?	This greenfield site is within Crockenhill Parish, adjacent to the urban confines of Swanley, which is classified as a town in the Settlement Hierarchy 2025 and has a range of services, facilities and public transport infrastructure. The site lies fully within the Green Belt and parts of it are considered to constitute provisional grey belt land. However, Footnote 7 constraints are present – the most significant being the Kent Downs National Landscape covering part of the site, as well the siting of heritage assets. Insufficient information has been provided assessing the impact on the National Landscape, heritage assets and their settings, and as such it cannot be concluded that this would not provide a reason to restrict or refuse development. As such, at this time, the site is not considered to constitute grey belt land. No details of a comprehensive active travel and sustainable
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	transport plan have been provided, and it could not be concluded that the services and facilities at Swanley could be accessed in a sustainable way. No detailed information assessing access, transport, noise and air quality impacts were provided and, given the scale of the proposal, it could not be concluded that these could be addressed satisfactorily. This would be a complex site to deliver, and overall, insufficient detail is available to assess whether the site's constraints could be addressed. The site promotor considers that these detailed matters should be assessed through the planning application process rather than constrained by the Local Plan, however the aim of the plan-making process is to ensure that these issues are resolvable. As set out above, such an assessment has not been possible based on the information submitted.
Availability	The site has been submitted by a site promotor who confirms that the various landowners are in agreement with the submission of their land.
Achievability	Insufficient information is available to determine where there are any constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The proposals for this site are of a significant scale and complexity. Insufficient information has been made available to conclude that the site's constraints can be addressed satisfactorily. The impact upon the Kent Downs National Landscape cannot be appropriately assessed, nor can the site's ability to deliver a comprehensive active and sustainable travel plan. Impacts upon the transport network (including access), noise and air quality have not been evidenced to be manageable. The site is unsuitable for development at this time.

GT/21/00003
Land North of 34 Ashen Grove Road, Knatts Valley, TN15 6YE



SITE DETAILS	
SHELAA Reference	GT/21/00003
Site Area (Ha)	1.68
Developable Area (Ha)	1.68
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a proposal for a new Gypsy and Traveller site on an agricultural field in Knatts Valley. The site is greenfield land fully within the Green Belt and lies fully within the Kent Downs National Landscape. The site lies more than 2km from a town or local centre and from a train station.
Site Type	Gypsy and Traveller Pitches
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Development Strategy tests not applicable to Gypsy and Traveller sites – all Gypsy and Traveller sites to progress to Stage 2 site assessments.
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	1km from West Kingsdown	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Completely within the Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Within Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Other – 100%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	Contaminated Land Assessment (former farm land)	
Noise Pollution	No specific risk	
Air Quality	Not within AQMA	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvement	
Settlement Classification	Within/adjacent to hamlets or in open countryside	
Town and Local Centres	Over 2km from Town or Local Centre	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
16	4	6

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	The site is a greenfield site in Knatts Valley, which is classified as a hamlet in the Settlement Hierarchy 2025 and has very limited access to services and facilities. The site also lies over 2km from a Town or Local Centre, as well as from a train station. The site lies fully within the Green Belt, and, although it is considered to be grey belt under national policy, this is considered to be outweighed by the unsustainable location of the site as well as its location fully within the Kent Downs National Landscapes. It is therefore considered that this site is unsuitable for Gypsy and Traveller use.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	This site is considered unsuitable for development, due to its unsustainable location and its position within the National Landscapes. The site is therefore not proposed for allocation.

HO/21/00002
Land adjoining Bank Buildings, Station Road, Otford



SITE DETAILS	
SHELAA Reference	HO/21/00002
Site Area (Ha)	0.1
Developable Area (Ha)	0.1
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site situated within the urban confines of Otford. The site a single building and associated hardstanding/scrubland. The site is bound by open space to the east and south, the railway line to the west and Station Road, the A225 to the north. The site benefits from an existing access off of the A225.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within urban confines of Otford
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within urban confines of Otford	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	No	
Existing allocation / designation	Open Space – Chalk Pit Recreation Ground (64%)	
Proposed use / designation	Open Spaces – Chalk Pit Recreation Ground, Otford Natural & Semi Natural (64%)	
Green Belt	Within Urban Confines of Otford	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Within 100m buffer of Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Otford Conservation Area Within 200m of Scheduled Monument Otford Palace	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment – proximity to railway	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing Access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Otford	
Town and Local Centres	Within 800m of Otford High Street and Otford, Sevenoaks Road Within 2km of Kemsing, The Parade	
Train Station	Within 800m of Otford	

GREEN	AMBER	RED
22	3	2

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site within the urban confines of Otford, which is classified as a Local Service Centre in the Settlement Hierarchy, and it is therefore considered that this site is in a sustainable location, close to key services and facilities. The site is also well located for public transport, being within 800m of Otford Train Station. The site does not lie within the Green Belt, however the site is fully within the Kent Downs National Landscapes, although it is noted that this is a brownfield site. It is considered that there is existing capacity on the transport network and the existing access to the site could be utilised, though contributions towards improvements may still be sought. The site lies within 200m of Otford Conservation Area and a Scheduled Monument at Otford Palace. It is noted that the site lies within the Open Space designation at Otford Chalk Pit Recreation Ground and Otford Natural and Semi Natural, and therefore it is considered that this site is not suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is not considered suitable for development due to the location within an open space designation.

HO/21/00022
Footpath Nursery, New Barn Road, Swanley



SITE DETAILS	
SHELAA Reference	HO/21/00022
Site Area (Ha)	2.07
Developable Area (Ha)	2.07
Brownfield / Greenfield	Greenfield
Planning History	No planning history. Formerly used as a horticultural nursery.
Previous SHELAA Ref (2018)	MX45
Site Description	The site comprises a former horticultural nursery with some accompanying paraphernalia remaining and a significant area of overgrown scrubland and woodland. It is entirely covered by a TPO and bounded by New Barn Road to the north, residential development to the east and west and woodland to the south.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to Swanley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Swanley	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Swanley	
Green Belt Stage 3	Not grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium	
Agricultural Land Quality	Grade 2 - 65.66%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	Air Quality Assessment- impact of development on adjacent junctions (Traffic to move through AQMA)	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 400m of Swanley	
Town and Local Centres	2km of Hextable, Upper Main Road and Swanley Town Centre	
Train Station	2km of Swanley Station	

GREEN	AMBER	RED
15.5	10	1.5

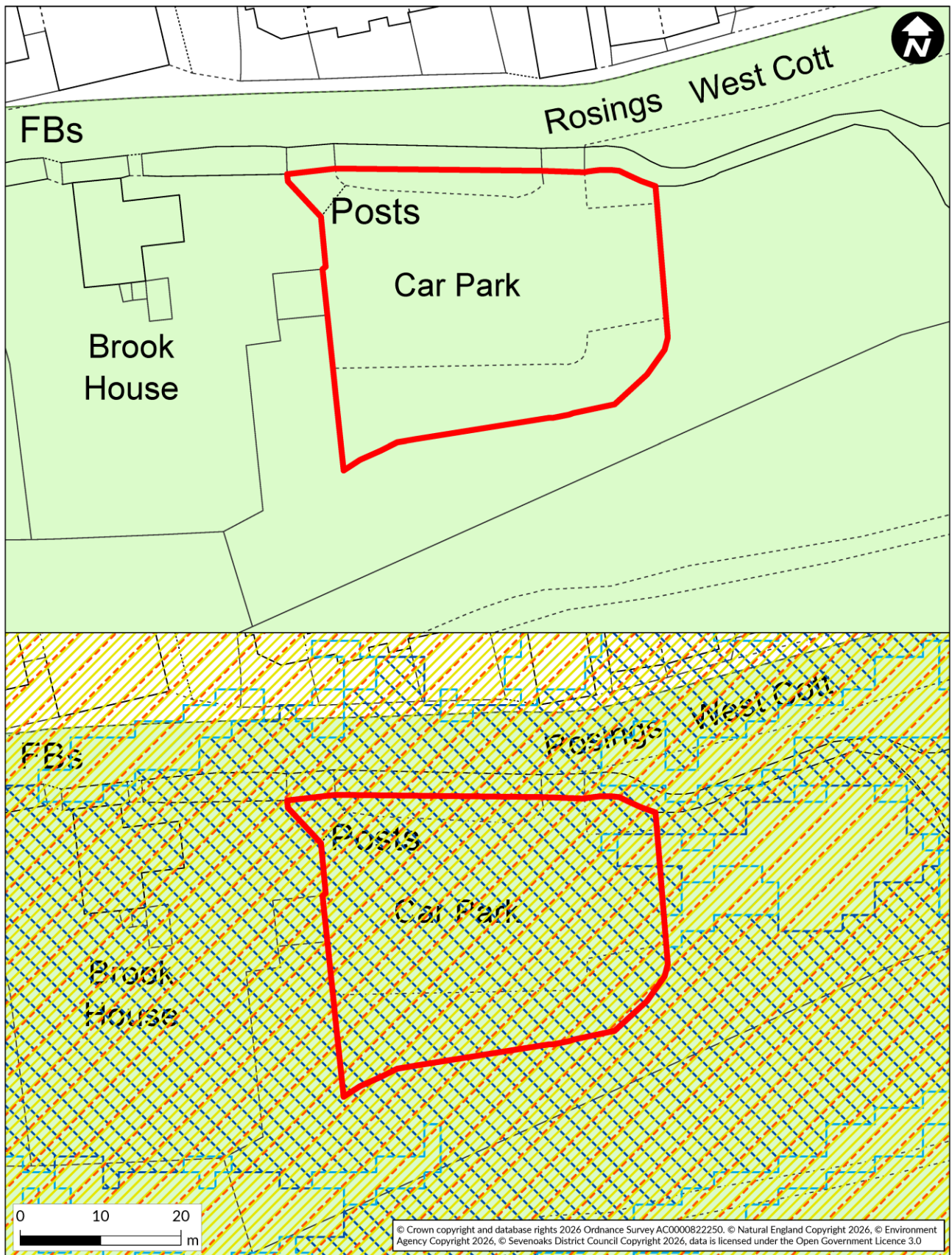
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a partially brownfield site adjacent to the urban confines of Swanley, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, including Swanley Train Station. The site is strongly performing Green Belt and is not considered to be grey belt land due its location between a Town and a Service Settlement, playing a fundamental role in preventing the merging of settlements. The site is also partly Grade 2 Agricultural Land Quality. Due to the constrained nature of the site, it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is highly constrained by strong performing Green Belt and partly Grade 2 Agricultural Land Quality. Therefore, the site is not proposed for allocation.

HO/21/00026
Pitts Car Park, High Street, Westerham



SITE DETAILS	
SHELAA Reference	HO/21/00026
Regulation 18 2025 Reference	WEST3
Site Area (Ha)	0.13
Developable Area (Ha)	0.13
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site adjacent to the urban confines of Westerham. The site currently comprises an area of hardstanding in use as a car park. The site is bound by the River Darent and the A25 High Street to the north, residential to the west and woodland to the east and south. The site benefits from two existing access points off the A25 High Street.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – PDL adjacent to urban confines of Westerham
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Westerham Urban Confines	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Car Park	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Within Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within Westerham Conservation Area Within 200m of 16 listed buildings Within 200m of Squerryes Court Registered Park/Garden	
Contamination Issues	Contaminated Land Assessment – former use of site	
Noise Pollution	Noise Assessment – adjacent to A25	
Air Quality	No specific risk	
Mineral Safeguarding Area	Fully within Sub Alluvial Terrace Partially within Limestone – Hythe Formation – Kentish Ragstone	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent Westerham	
Town and Local Centres	Within 800m of Westerham Town Centre	
Train Station	Over 2km from Train Station	

GREEN	AMBER	RED
16	6	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site lies fully within the Kent Downs National Landscape. The site also lies near to Westerham Wood SSSI.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Westerham Town Council</u> A response from Westerham Town Council supports the inclusion of the site and suggests that the level of development proposed within the Regulation 18 consultation is appropriate for Westerham.
Other Consultation Bodies	<u>Kent Downs National Landscape</u> A response from the Kent Downs National Landscape unit highlights that the site lies within the Kent Downs National Landscapes and provides further guidance. <u>Ministry of Defence</u> A response from the Ministry of Defence highlights the site is within the RAF Kenley (Birdstrike Safeguarding Zone) and that development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
General Response	Respondents noted the site lies entirely in Flood Zone 3 between branches of the River Darent, and lacks reliable drainage maintenance, which could worsen flooding of neighbouring properties. Multiple landscape and heritage designations, including Green Belt, Kent Downs National Landscape, conservation area status and nearby listed buildings, should restrict development and there is a risk of structural damage from increased traffic. Pitts Car Park provides crucial business and residential parking where alternatives are scarce;

	its loss would force vehicles onto the narrow A25, reduce traffic flow, raise accident risk and worsen air pollution. Public access to adjacent ponds, allotments and riverside paths would be severed, while ecology assessments are needed for badger setts, toad colonies, great crested newts and proximity to the Westerham Wood SSSI. The site has no permanent structures, inadequate utilities and limited local services. A low-lying access bridge and maintenance issues may further impede development.
Key issues raised	Flood risk and hydrology Landscape, Green Belt, AONB and heritage designations Parking provision and town centre economy Traffic, access and highway safety Public access, allotments and recreational amenity Ecology and protected species Previously Developed Land status and permanence of structures Utilities and local service capacity

SITE PROMOTER RESPONSE

No response was received from the site promoter.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site situated adjacent to Westerham urban confines, which is classified as a Town in the Settlement Hierarchy 2025 and therefore the site is considered to be sustainably located in relation to key services and facilities, although it is noted that the site lies over 2km from a railway station. The site lies fully within the Green Belt, although it is considered to constitute Grey Belt land under national policy due to its status as previously developed land. The site also lies fully within the Kent Downs National Landscapes, although this is considered to be balanced by the sites status as PDL. The site lies within Flood Zone 3, adjacent to the River Darent and this is considered to be an unacceptable risk. The site also lies within Westerham Conservation Area, and within close proximity to a number of heritage assets, an AQMA and two mineral safeguarding areas, all of which will need further consideration. Contaminated Land and Noise Assessments would be required for a site to come forwards on this site. The site benefits from
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	two accesses off of A25 High Street and there is considered to be capacity on the surrounding network. Due to the sites significant flood risk, the site is considered unsuitable for allocation.
Availability	The site has been submitted by the landowner and is considered available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable for allocation due to significant flood risk within Flood Zone 3.

HO/21/00034
Land Adjacent to 69 Hever Road, West Kingsdown, Kent. TN15 6ED



SITE DETAILS	
SHELAA Reference	HO/21/00034
Site Area (Ha)	6.3
Developable Area (Ha)	6.3
Brownfield / Greenfield	Greenfield
Planning History	No planning history. Open field in part equestrian use.
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site comprising an open field which is partly used for equestrian purposes and slopes downwards from the east. Public Right of Way SD264 runs east/west through the centre of the site, and it is largely bounded by ancient woodland. The land opens to residential development in the southeastern and southwestern corners.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of West Kingsdown
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to West Kingsdown	
Land Use (GF/PDL)	100% Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt adjacent to West Kingsdown	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium	
Agricultural Land Quality	Other	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Within and within 15m buffer of Ancient and Semi-Natural Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (former farm land)	
Noise Pollution	Noise Assessment (Brands Hatch)	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 250m of West Kingsdown	
Town and Local Centres	Within 800m of West Kingsdown, Hever Road	
Train Station	Over 2km from a railway station	

GREEN	AMBER	RED
16	8	2

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of West Kingsdown, which is identified as a Service Village through the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to key services and facilities, although does not benefit from access to a train station. The site is fully within moderate Green Belt and is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. However, notwithstanding that the site is adjacent to the urban confines of West Kingsdown, it is considered that this site would present an unnatural extension to the urban confines boundary, and accordingly this site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site would present an unnatural extension to the urban confines of West Kingsdown and is not considered suitable for development.

HO/21/00049
Land at Corner of Church Road and Manor Lane, Hartley, Kent



SITE DETAILS	
SHELAA Reference	HO/21/00049
Site Area (Ha)	0.62
Developable Area (Ha)	0.61
Brownfield / Greenfield	Greenfield
Planning History	No planning history
Previous SHELAA Ref (2018)	Part of HO151
Site Description	The site forms part of a wider parcel of land which appears to be largely wooded, although its stated use is as a former cherry orchard. It is bounded by Manor Lane and Church Road to the south and east with a mixture of woodland and residential development to the north and west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Within settlement buffer of Hartley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hartley Urban Confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed building	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 250m of Hartley	
Town and Local Centres	Within 800m to Hartley, Cherry Trees Within 2km of New Ash Green, Village Centre	
Train Station	Over 2km to nearest train station	

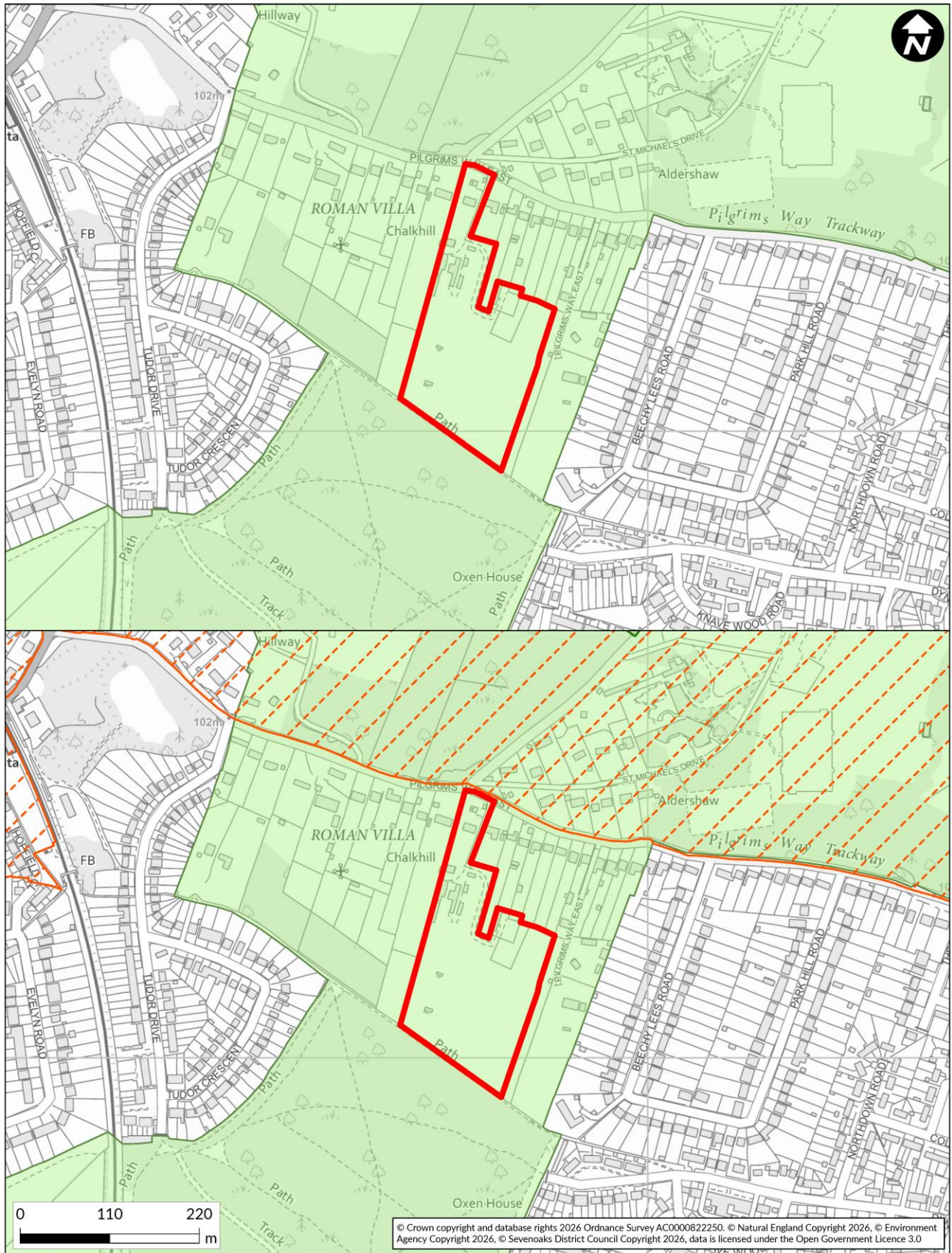
GREEN	AMBER	RED
19	3	4

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site which lies within the Green Belt, but is not directly adjacent to the urban confines boundary for Hartley, which is the nearest settlement. The site lies fully within strongly performing Green Belt and is considered to constitute grey belt land under national policy. However, the site is not located well for sustainability, and lies over 2km from the nearest railway station. It is also considered that access to this site would be difficult. The site is currently woodland, and although there is no formal protection, the loss of the woodland is not supported. It is considered that there is limited capacity on the transport network, which would need further consideration, although access to the site is difficult. Due to the constrained nature of the site, difficult access, and that the site is not directly adjacent to a settlement confines boundary, this site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is not adjacent to the settlement boundary for Hartley and is not sustainable, as well as having a difficult access. Therefore, the site is not proposed for allocation.

HO/21/00053
Land to the rear of Pilgrims Way East, Otford



SITE DETAILS	
SHELAA Reference	HO/21/00053
Site Area (Ha)	3.42
Developable Area (Ha)	3.42
Brownfield / Greenfield	Partially brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a partially brownfield site between the urban confines of Kemsing and Otford. The site comprises a residential property, smallholding and associated land. The site is bound by Pilgrims Way West, residential to the east and west and agricultural land to the south. The site has an existing access off Pilgrims Way West.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Kemsing and Otford
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Mixed (20% previously developed land)	
Existing use	No	
Existing allocation / designation	No existing allocation/designation	
Proposed use / designation	No proposed allocation/designation	
Green Belt	Within Green Belt adjacent to Otford and Kemsing	
Green Belt Stage 3	Not grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Grade 3 (28.71%) Grade 4 (62.04%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Partially contains Scheduled Monument Partially within 100m of Otford Court Historic Park/Garden	
Contamination Issues	Contaminated land assessment required	
Noise Pollution	No specific risk	
Air Quality	Air quality assessment required	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Limited capacity on transport network	
Settlement Classification	Adjacent to Otford	
Town and Local Centres	Within 2km of Kemsing The Parade Within 2km of Otford High Street Within 2km of Otford Sevenoaks Road	
Train Station	Within 800m of Otford Train Station	

GREEN	AMBER	RED
16	9	1

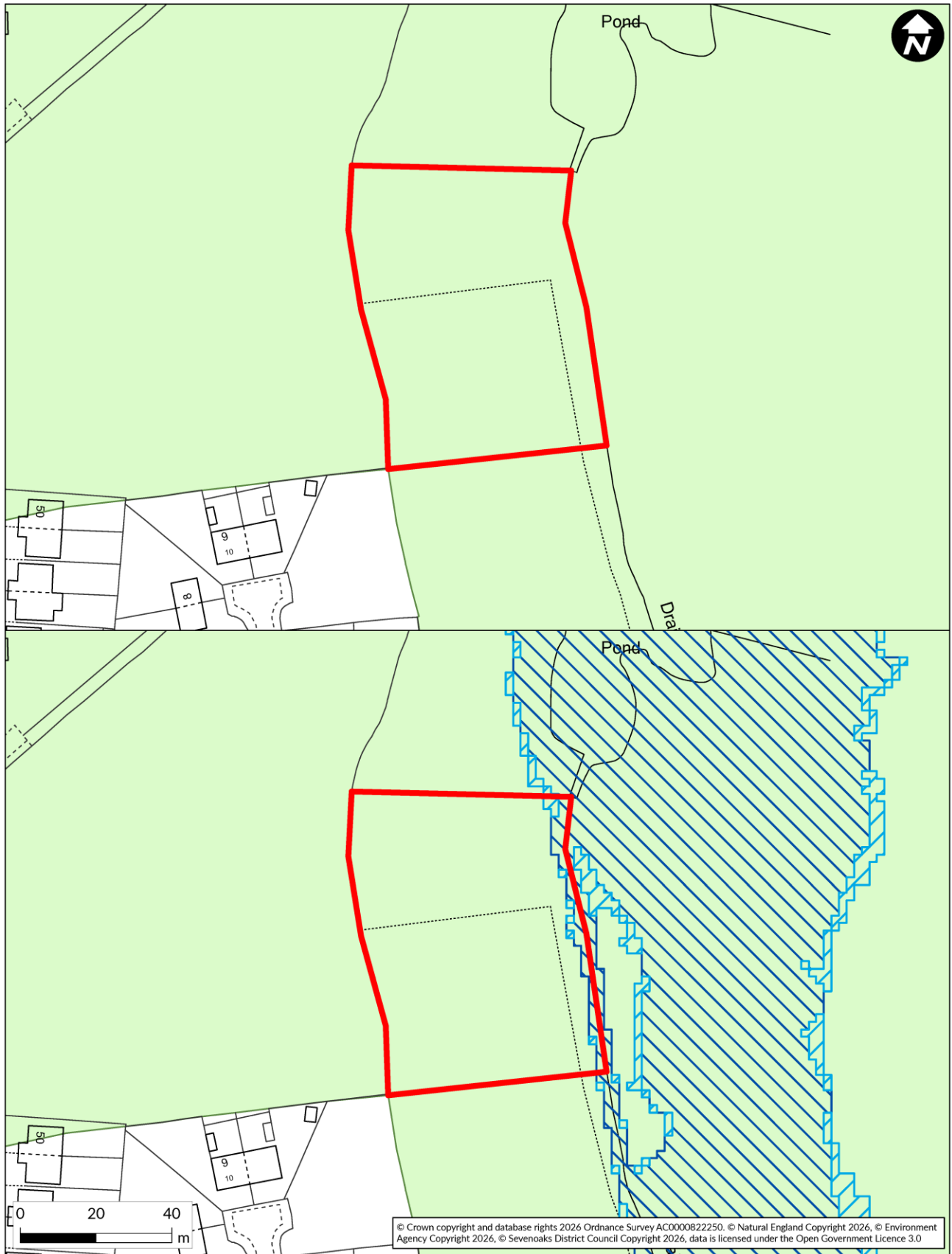
SHELAA 2026 ASSESSMENT

CONCLUSIONS

Suitable?	The site is located in between the urban confines of Otford (a primary service settlement) and Kemsing (a secondary service settlement). The site is therefore considered to be in a sustainable location, close to key services and facilities and within walking distance of a railway station. The site benefits from an existing access off Pilgrims Way West. There is considered to be limited capacity on the transport network and therefore improvements would be required. The site is a partially brownfield site within the Green Belt and is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site has a scheduled monument on the site and also is considered to play an important role in preventing the merging of Otford and Kemsing. Therefore, this site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is considered unsuitable due to the presence of a scheduled monument and the key location preventing the merging of Otford and Kemsing.

HO/21/00067
Land rear of Mills Crescent, Seal



SITE DETAILS	
SHELAA Reference	HO/21/00067
Site Area (Ha)	0.44
Developable Area (Ha)	0.44
Brownfield / Greenfield	Greenfield
Planning History	20/02789/FUL – planning permission granted for residential development on adjacent land
Previous SHELAA Ref (2018)	N/A
Site Description	The site comprises agricultural land at the northeastern tip of Seal. The site is otherwise largely surrounded by open countryside.
Site Type	New build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Seal
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No existing allocation/designation	
Proposed use / designation	No proposed allocation/designation	
Green Belt	Within Green Belt adjacent to Seal	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 3	
Flood Risk	Flood Zone 2 (0.85%) Flood Zone 3 (4.38%)	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Within Sub Alluvial River Terrace (85.52%)	
Site Access	New access required	
Network Capacity	Capacity on transport network (contributions may still be sought)	
Settlement Classification	Adjacent to Seal	
Town and Local Centres	Within 2km of Seal High Street	
Train Station	Not within 2km of train station	

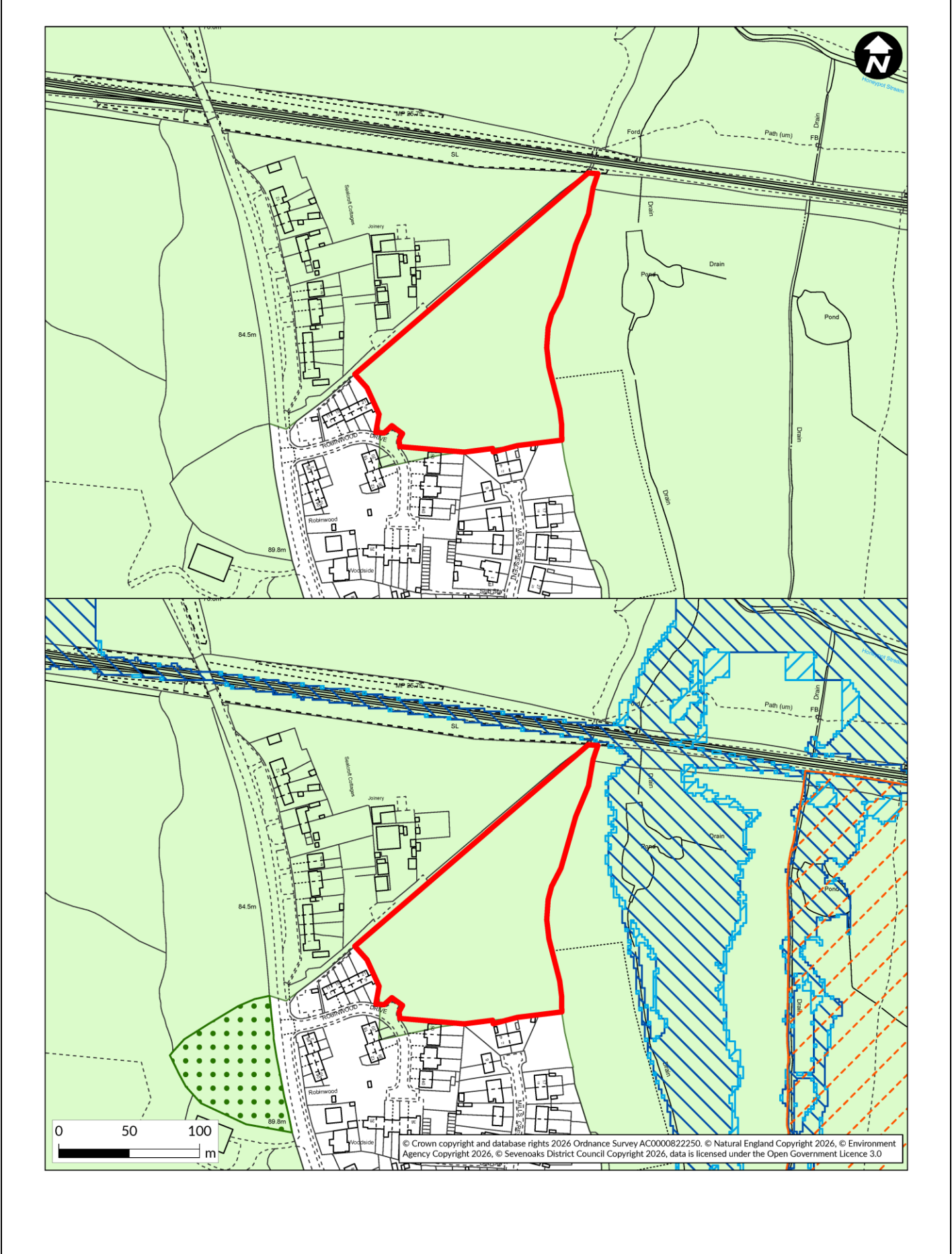
GREEN	AMBER	RED
18	5	3

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the settlement confines of Seal, which is a Secondary Service Settlement in the Settlement Hierarchy 2025, close to services and facilities. It is considered a sustainable location. The site is considered grey belt land under national policy due to its performance against GB purposes A, B and D. The site comprises Grade 3 agricultural land and is largely within a Mineral Safeguarding Area. The potential for extraction would need exploring. Overall, the land is fairly unconstrained, however, it is considered that this would amount to an unnatural extension to the settlement boundary and is not suitable for allocation.
Availability	The site has been submitted on behalf of the landowner and is considered to be available in Years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is considered is not considered suitable for allocation due to it being an unnatural extension to the settlement boundary.



SITE DETAILS	
SHELAA Reference	HO/21/00081
Site Area (Ha)	1.65
Developable Area (Ha)	1.65
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO103
Site Description	This is a greenfield, undeveloped parcel of land at the northeastern edge of Seal. It is bounded by a railway line to the north, agricultural land/open countryside to the east, residential development to the south and a field to the west. An access could be taken from Robinwood Drive.
Site Type	New build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to the urban confines of Seal
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No existing allocation/designation	
Proposed use / designation	No proposed allocation/designation	
Green Belt	Within Green Belt adjacent to Seal	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 2	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within or adjacent to SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within or adjacent to Local Wildlife Site	
Local Nature Reserve	Not within or adjacent to Local Nature Reserve	
Ancient Woodland	Not within or adjacent to ancient woodland	
Presence of Heritage Assets	Not within vicinity of heritage assets	
Contamination Issues	No specific risk	
Noise Pollution	Noise impact assessment required (proximity to railway line and M26)	
Air Quality	Air quality impact assessment required (proximity to M26)	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Seal	
Town and Local Centres	Within 2km of Kemsing The Parade Within 2km of Seal High Street	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
18	5	3

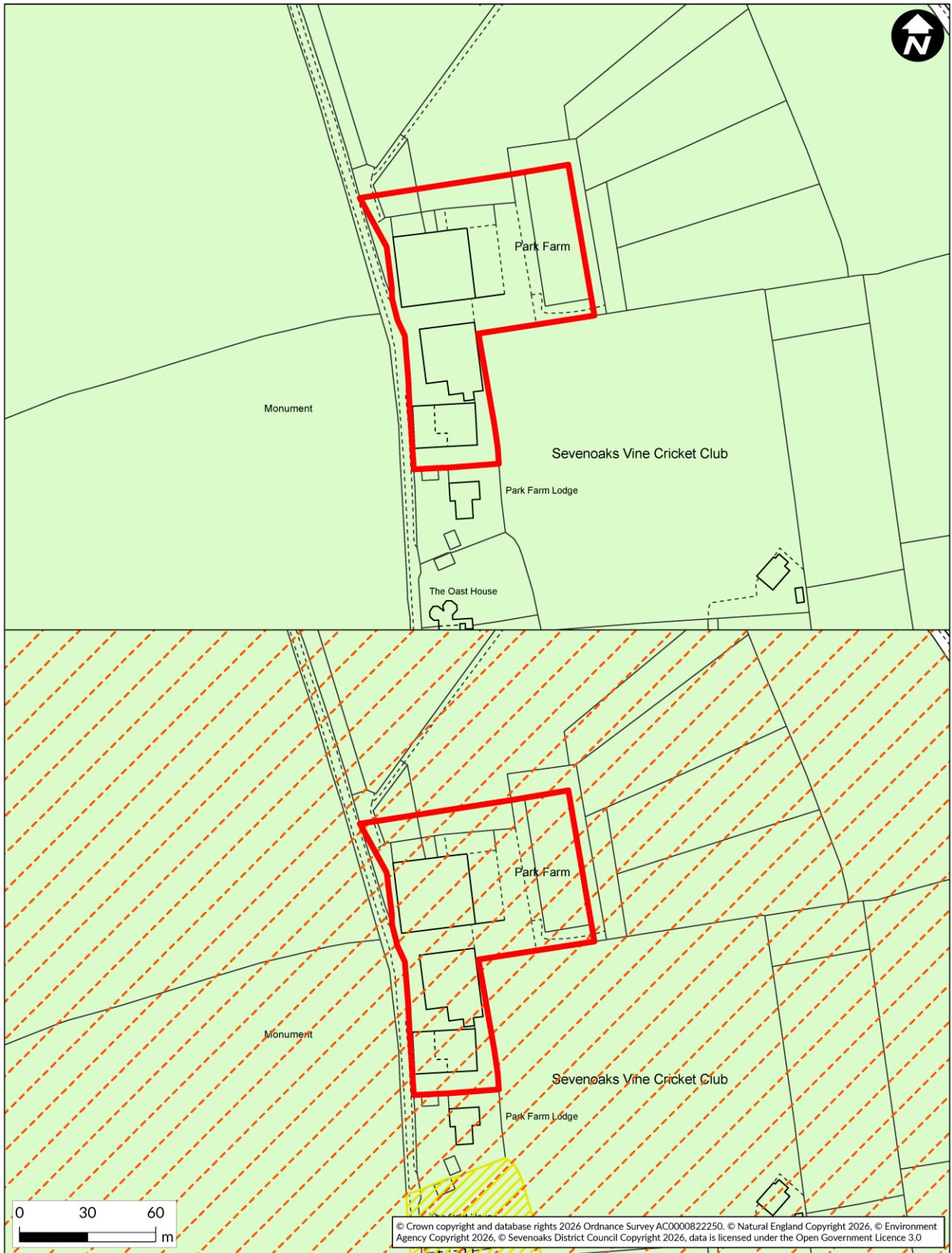
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	The site is located adjacent to the urban confines of Seal which is a Secondary Service Centre in the Settlement Hierarchy 2025 with access to some services and facilities, although this does not include a train station. The site is considered to constitute grey belt in a sustainable location under national policy due to its performance against Green Belt purposes A, B and D. Air quality and noise impact assessments would be required due to the proximity to the railway line and M26 motorway, but these are considered to be resolvable issues. The site falls entirely within an area of Grade 2, best and most versatile agricultural land. The site would also present an unnatural extension to the urban confines of Seal and is not considered suitable for development.
Availability	The site has been submitted on behalf of the landowner and is considered to be available in Years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is considered to present an unnatural extension to the urban confines of Seal and is entirely constrained by best and most versatile agricultural land. The site is not considered suitable for allocation.

HO/21/00098
Park Farm, Otford



SITE DETAILS	
SHELAA Reference	HO/21/00098
Site Area (Ha)	0.78
Developable Area (Ha)	0.78
Brownfield / Greenfield	Brownfield
Planning History	None
Previous SHELAA Ref (2018)	HO316
Site Description	This is a brownfield site in the Green Belt near Otford. The site comprises a stables and livery. The site is bound by agricultural to the north, east and west, and residential and a cricket club to the south. The site has an existing access.
Site Type	New Build and Conversion
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of urban confines of Otford
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within 250m of Otford	
Land Use (GF/PDL)	Previously developed land	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	100% within Kent Downs National Landscapes	
Landscape Sensitivity	Medium – 100%	
Agricultural Land Quality	Grade 2 – 83.06%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Otford Conservation Area	
Contamination Issues	Contaminated Land Assessment (former commercial land use)	
Noise Pollution	Assessment of impact of traffic along private road to High Street (Impact on existing residential)/ Noise Assessment Railway line	
Air Quality	No specific risk	
Mineral Safeguarding Area	No	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	Within 250m of Otford	
Town and Local Centres	Within 800m of Otford High Street and Otford, Sevenoaks Road Within 2km of Kemsing, The Parade	
Train Station	Within 800m of Otford	

GREEN	AMBER	RED
15.5	6	5.5

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a brownfield site within the Green Belt, near Otford, which is identified as a Primary Service Centre in the Settlement Hierarchy 2025. However, the site does not lie directly adjacent to the settlement boundary. The site is considered to be in a sustainable location, close to key services and facilities in Otford, including Otford Train Station. The site lies fully within the Green Belt but is considered to be grey belt under National Policy, due to the sites PDL status. The site also lies fully within the Kent Downs National Landscape and is Grade 2 Agricultural Land Quality, although these constraints are considered to be outweighed by the fact that the site is PDL. Access to the site is considered to be difficult and there is considered to be no capacity on the surrounding transport network. Due to these key issues, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	Access to the site is difficult and there is considered to be no capacity on the transport network. Therefore, the site is not proposed for allocation.

HO/21/00103
The Limes and Jonquils, Bough Beech Road, Four Elms



SITE DETAILS	
SHELAA Reference	HO/21/00103
Regulation 18 2025 Reference	FE1
Site Area (Ha)	0.35
Developable Area (Ha)	0.35
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site within Four Elms. The site currently comprises a number of buildings, including two residential properties, a disused village shop and storage space as well as an abattoir and lairage and other outbuildings, and associated hardstanding. The site is bound by residential development to the north, east and west, an orchard to the east and Bough Beech Road to the south. The site benefits from an existing access off Bough Beech Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Previously Developed Land
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Completely within the Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Grade 4	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 3 Listed Buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within a Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Four Elms	
Town and Local Centres	Over 2km from Town or Local Centre	
Train Station	Over 2km from Train Station	

GREEN	AMBER	RED
18	5	3

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	No responses were received from Statutory Consultees.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hever Parish Council</u> A response from Hever Parish Council highlights landownership and availability concerns for the site. In addition, the response states that the Four Elms crossroads, adjacent to the site, has been classified as a crash cluster site by KCC Highways and sets out congestions and safety concerns with the junction.
General Response	Respondents assert that the council failed to verify land ownership and that promoters misrepresented legal titles. They note absence of landowner consent, private rights of way, unauthorised parking spaces and ongoing abattoir operations render the site unavailable for housing. Contact from prospective developers has caused resident stress and may amount to harassment. Proposed access at the Four Elms crossroads, a known crash cluster, could worsen congestion and collision risk. Feedback highlights limited parking, local service capacity and the derelict state of historic buildings, risking harm to village character. Respondents call for removal of the site from the plan and legal action over false submissions.
Key issues raised	Land ownership and legal availability Developer engagement and Council due diligence Junction safety and highway capacity Local services and infrastructure capacity Brownfield redevelopment and site condition Third-party rights, parking and access constraints Heritage, rural character and landscape impact Parking provision and on-street impacts

SITE PROMOTER RESPONSE

No response was received to the Regulation 18 consultation from the site promoter.

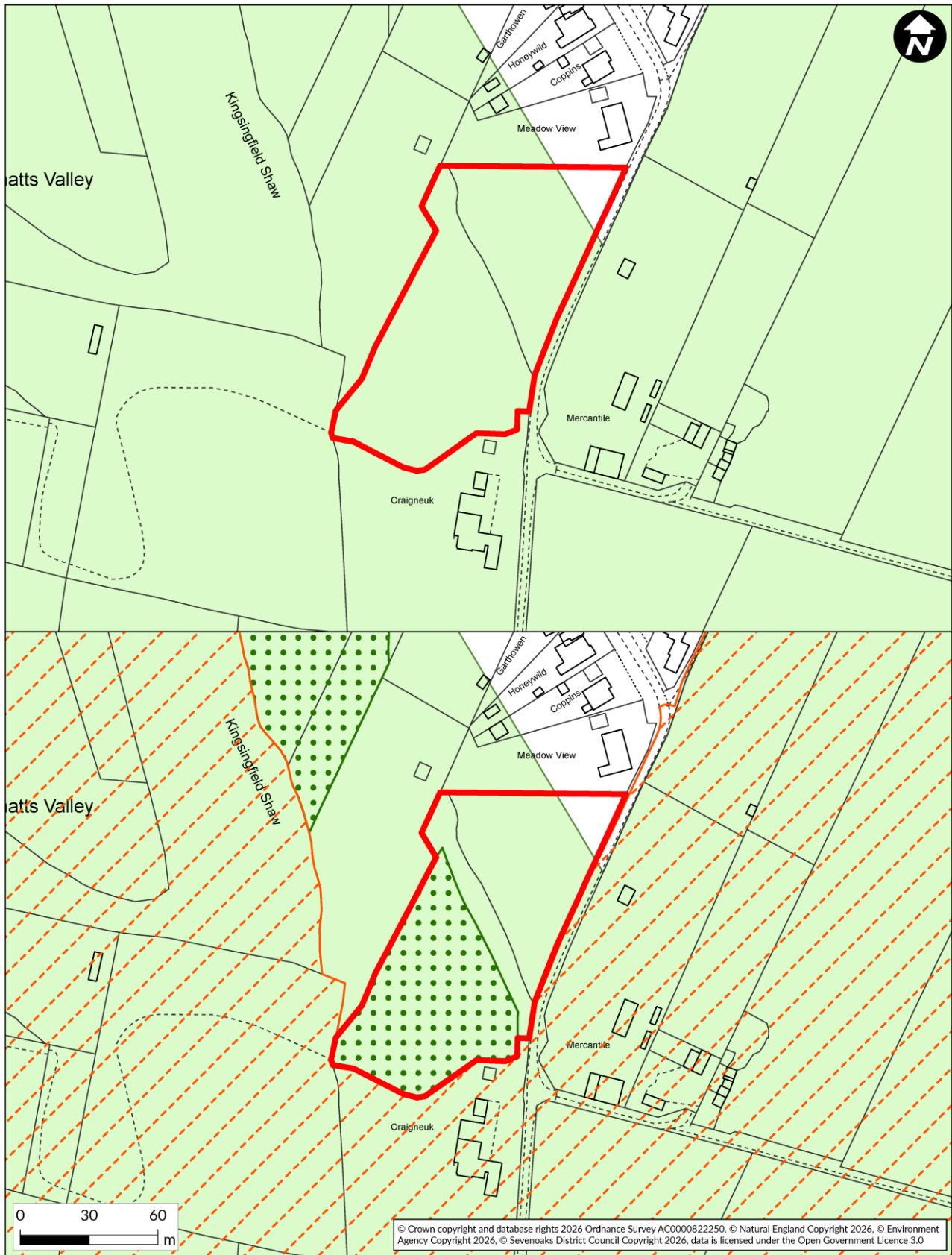
SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site located within Four Elms, which is classified as a village within the Settlement Hierarchy 2025. It is therefore acknowledged that this is not considered to be in a highly sustainable location, notwithstanding that Four Elms does have a number of services and facilities. The site also lies over 2km from a train station. The site lies fully within the Green Belt but is considered to be grey belt land under national policy, due to its PDL status and performance against Green Belt purposes A, B and D. The SSSI impact zone will require consultation and further consideration will need to be given to the 3 listed buildings which are in close proximity to the site. The site does not lie within national landscapes and there are no other constraints which would make this site unsuitable. Therefore, given the unconstrained nature of this site and its PDL and grey belt status, the site is considered to be suitable for residential development.
Availability	There are availability concerns and landowner disputes which have been identified through the Regulation 18 consultation and landowner support is unclear.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is unsuitable due to a lack of clarity of land ownership and support for the allocation.

HO/21/00104

Land between Meadowview and Craigneuk, Kingsingfield Road, West Kingsdown, Kent, TN15 6LJ



SITE DETAILS	
SHELAA Reference	HO/21/00104
Site Area (Ha)	0.93
Developable Area (Ha)	0.47
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO299
Site Description	This is a greenfield site adjacent to (and partially within) the urban confines of West Kingsdown. The site comprises a parcel of land at the end of Kingsingfield Road containing a fenced grass field, used for grazing and area of woodland. The site is bound by residential development to the north, open countryside to the east and south, and woodland to the west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to (and partially within) urban confines of West Kingsdown
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Partially within West Kingsdown	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	95.27% within Green Belt	
Green Belt Stage 3	Grey Belt	
National Landscapes	0.25% within Kent Downs National Landscapes	
Landscape Sensitivity	Low-Medium – 95.27%	
Agricultural Land Quality	Grade 4 – 97.97%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Within 15m buffer of Knatts Valley, West Kingsdown	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	49.96% within Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvement	
Settlement Classification	Within 250m of West Kingsdown	
Town and Local Centres	Within 2km of West Kingsdown, Hever Road	
Train Station	Over 2km from train station	

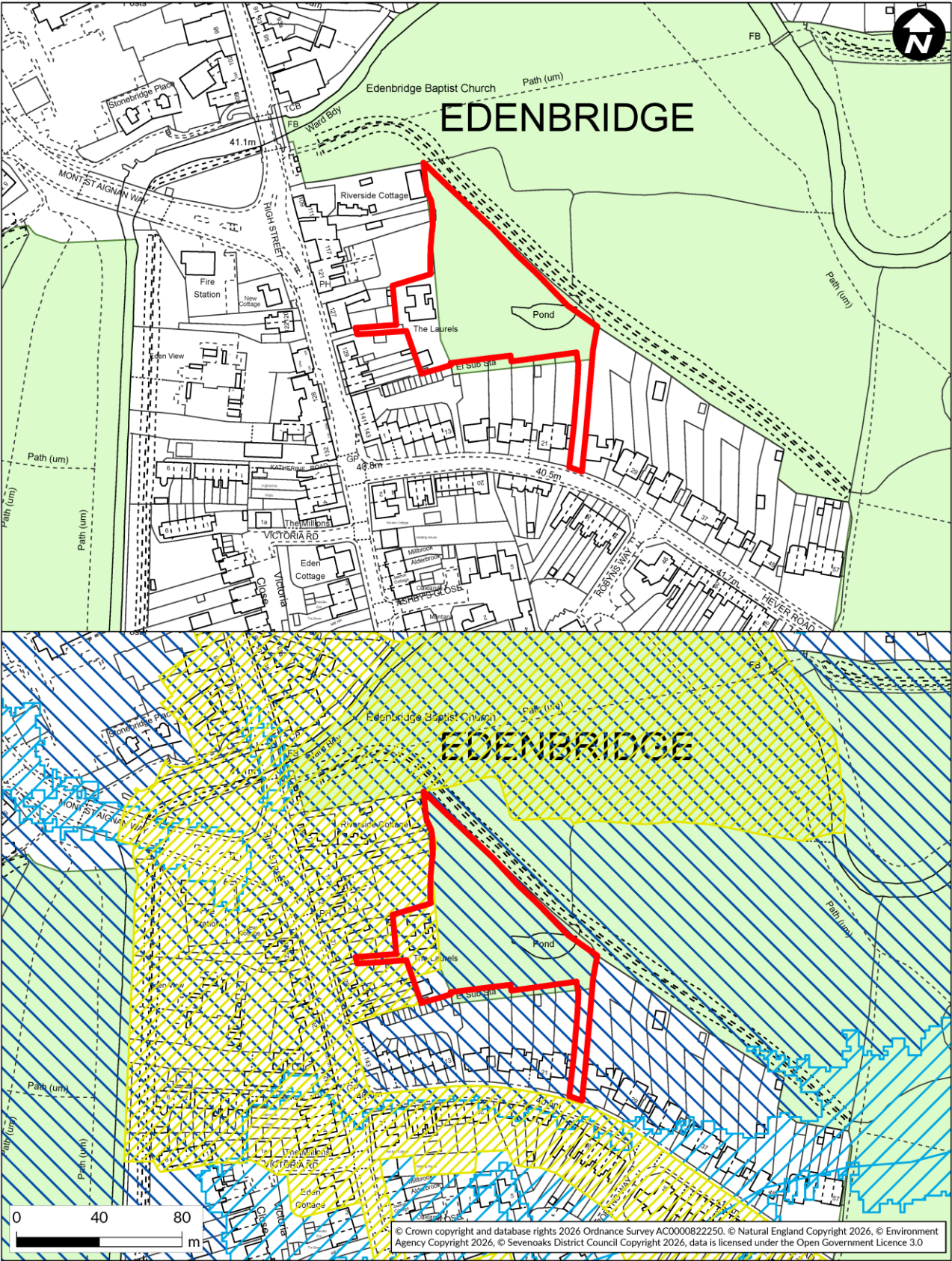
GREEN	AMBER	RED
17	7	2

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield Green Belt site adjacent to, and partially within, the urban confines of West Kingsdown, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is considered to be in a sustainable location, close to key services and facilities in West Kingsdown, although does not benefit from access to a train station. The sites is mostly within the Green Belt but is Grey Belt under national policy. The site is not within National Landscapes, although is adjacent to the Kent Downs National Landscape boundary. However, Ancient and Semi-Natural Woodland covers half of the site and there is considered to be limited capacity on the surrounding transport network. A new access to the site would also be required. Due to the constrained nature of the site by Ancient and Semi-Natural Woodland, it is considered that the land is not suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is constrained by Ancient and Semi-Natural woodland. Therefore, the site is not proposed for allocation.

HO/21/00106
Land at The Laurels, High Street, Edenbridge, TN8 5AX



SITE DETAILS	
SHELAA Reference	HO/21/00106
Site Area (Ha)	0.52
Developable Area (Ha)	0.33
Brownfield / Greenfield	Partially brownfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a partially brownfield site adjacent to (and partially within) the urban confines of Edenbridge. The site comprises a residential dwelling and associated garden. The site is bound by residential to the south and west, and agricultural to the north-east. The site has an existing access off High Street.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to (and partially within) urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	23.47% in Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes but will be reprovided	
Existing allocation / designation	Town and Local Centre, Edenbridge – Southern Fringe (2.11%)	
Proposed use / designation	No	
Green Belt	76.53% within Green Belt, 23.47% in Edenbridge urban confine	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium 76.53%	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 2 and 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	36.09% within River Eden	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	13.7% within Edenbridge conservation area Within 200m of 22 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	14.55% within Sub Alluvial River Terrace	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within 400m of Edenbridge	
Town and Local Centres	Within 800m of Edenbridge Central Area, Edenbridge Southern Fringe and Edenbridge Northern Fringe	
Train Station	Within 2km of Edenbridge and Edenbridge Town Station	

GREEN	AMBER	RED
17	8	2

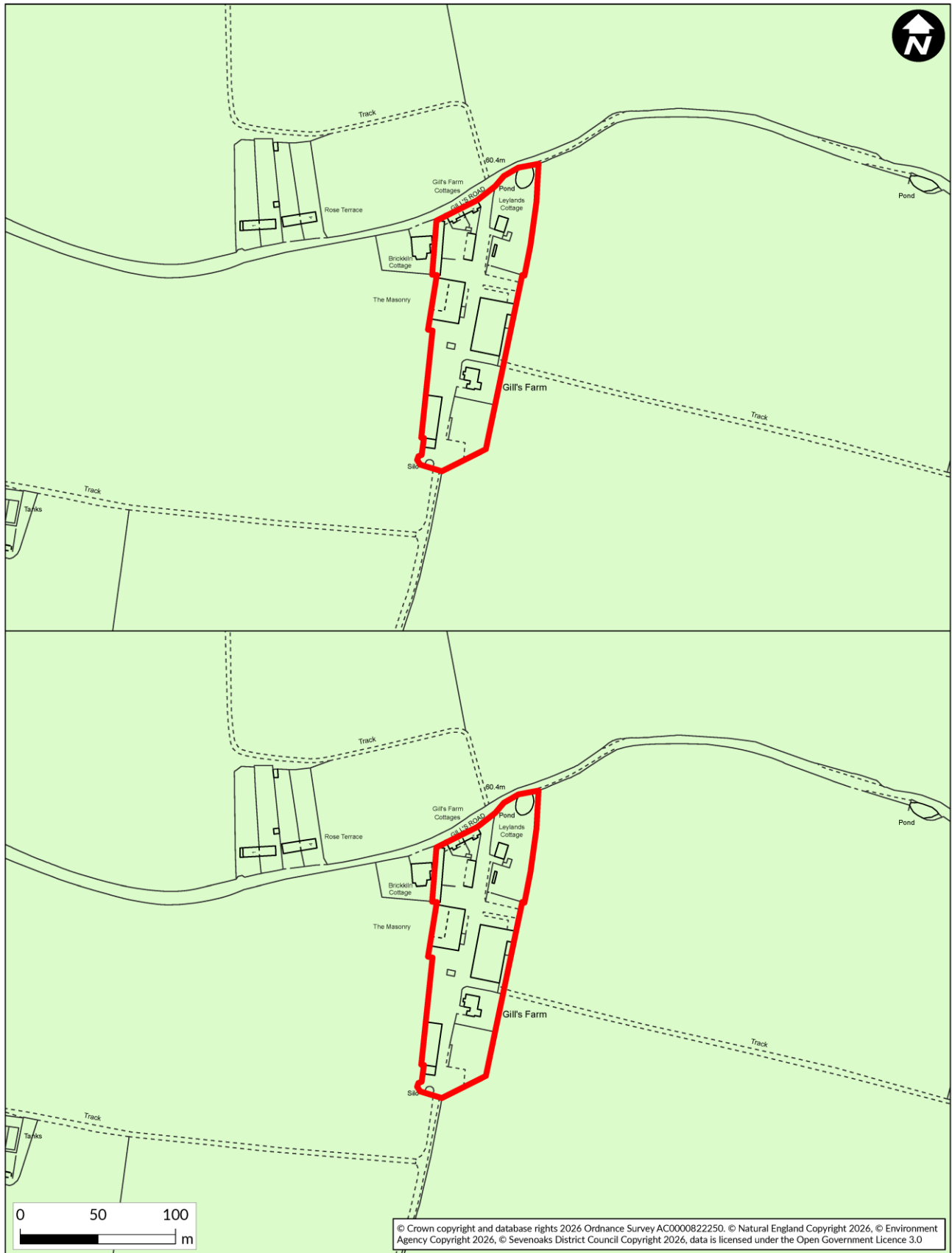
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a partially brownfield site which is adjacent to, and partially within, the urban confines of Edenbridge, which is identified as town in the Settlement Hierarchy 2025. The site is considered to be in a sustainable location, within close proximity to key services and facilities, including two train stations. The site lies majority within the Green Belt but is considered to be Grey Belt under national policy. The site also lies fully within Flood Zone 2 and Flood Zone 3, as well as partially within a Local Wildlife Site. The site has an existing access which could be utilised. Due to the constrained nature of the site, it is considered that the site is not suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is highly constrained by Flood Zone 2 and Flood Zone 3 and a Local Wildlife Site. Therefore, the site is not proposed for allocation.

HO/21/00109
Gills Farm, Gills Road, South Darent



SITE DETAILS	
SHELAA Reference	HO/21/00109
Site Area (Ha)	0.92
Developable Area (Ha)	0.92
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO127
Site Description	This a brownfield site in the open countryside. The site currently comprises commercial use and associated hardstanding, and agricultural use. The site is bound by Gills Road to the north, open countryside to the east, west and south. The site benefits from an existing access off Gills Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Previously Developed Land
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes but not allocated	
Existing allocation / designation	No existing allocation/designation	
Proposed use / designation	No proposed allocation/designation	
Green Belt	Within Green Belt and not adjacent to urban confines	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Grade 2	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	Contaminated land assessment required	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within open countryside	
Town and Local Centres	Not within 2km of town or local centre	
Train Station	Not within 2km of train station	

GREEN	AMBER	RED
19	3	5

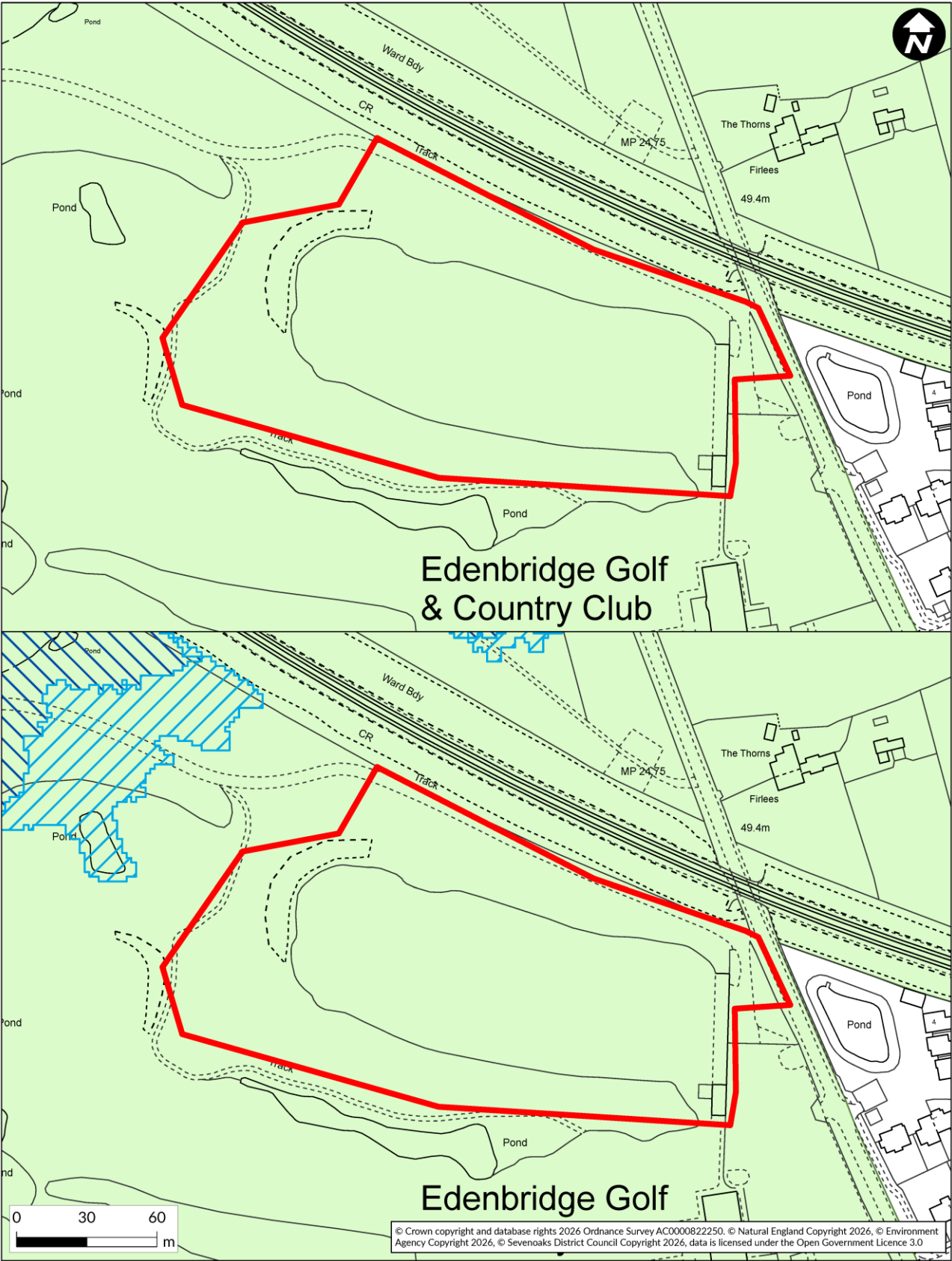
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site located in open countryside, and therefore the site is not considered to be sustainably located, being over 2km from a town or local centre and a train station. The site lies fully within the Green Belt but is considered to be grey belt under national policy due to its PDL status and performance against Green Belt purposes A, B and D. The site is fully Grade 2 agricultural land quality. A contaminated land assessment would be required for this site. Due to the constrained nature of this site by Grade 2 Agricultural Land Quality and the unsuitable location, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is constrained by Grade 2 Agricultural Land Quality and is not sustainably located, and therefore is unsuitable for development.

HO/21/00110
Kent and Surrey Golf Driving Range, Crouch House Road, Edenbridge, Kent



SITE DETAILS	
SHELAA Reference	HO/21/00110
Site Area (Ha)	2.51
Developable Area (Ha)	2.51
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO331, MX38
Site Description	This is a greenfield site adjacent to the urban confines of Edenbridge. The site comprises a golf driving range. The site is bound by Crouch House Road to the east, the railway line to the south, and golf course to the south and west. The site has an existing access off Crouch House Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	5.51m from Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within the green belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-High – 100%	
Agricultural Land Quality	Grade 3 – 100%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (previous farmland and potentially made ground)	
Noise Pollution	Noise Assessment (railway)	
Air Quality	AQ Assessment- Impact of development on nearby roads	
Mineral Safeguarding Area	No	
Site Access	New/additional access required	
Network Capacity	Capacity on transport networks (contributions towards improvements may still be required)	
Settlement Classification	Within 400m of Edenbridge	
Town and Local Centres	Access points within 2km of Edenbridge, Central Area, Northern Fringe and Southern Fringe	
Train Station	Access point within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
15	10	2

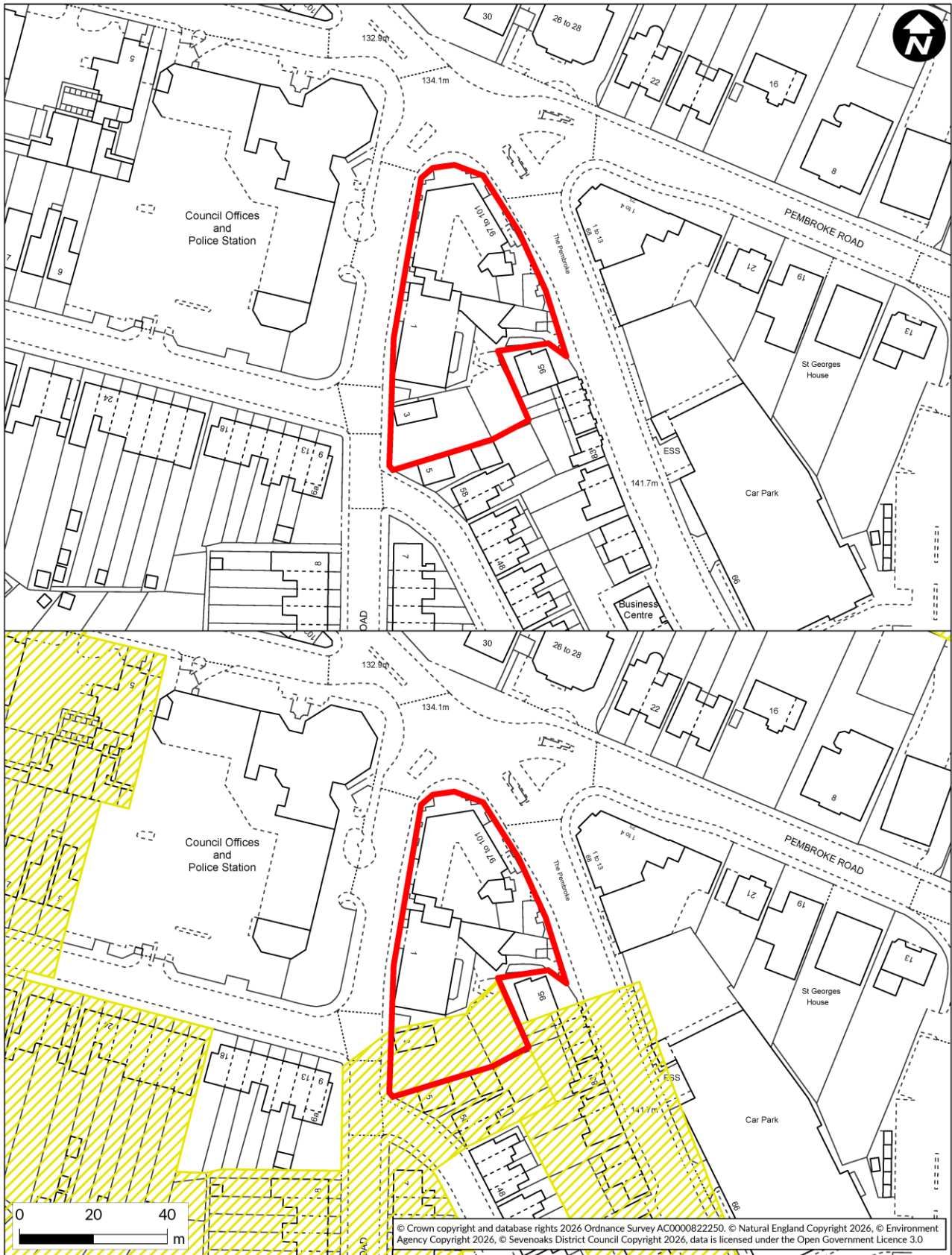
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site near to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although does not benefit from access to a nearby train station. The site is within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site also lies mostly in an area of medium-high landscape sensitivity and is Grade 3 agricultural land quality. Although the site lies adjacent to the settlement boundary of Edenbridge, it is considered that this site would present an unnatural extension to the urban confines of Edenbridge. Due to this, and the constrained nature of the site, it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is considered to present an unnatural extension to the urban confines of Edenbridge. The site is also constrained by Grade 3 agricultural land quality and medium-high landscape sensitivity. Therefore, the site is not considered suitable for allocation.

HO/21/00117
101 London Road, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/21/00117
Site Area (Ha)	0.25
Developable Area (Ha)	0.25
Brownfield / Greenfield	Brownfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site located within the urban confines of Sevenoaks Urban Area. The site comprises West Kent Housing Association offices and car park. The site is bound to the west by Argyle Road, north and east by London Road, and south by residential. The site has an existing access off Argyle Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within Sevenoaks Urban Area	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes (Employment)	
Existing allocation / designation	Yes – ADMP EMP1(g): London Road, Sevenoaks TLC – Sevenoaks Town Centre	
Proposed use / designation	No	
Green Belt	Within Urban Confines of Sevenoaks Urban Area	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban - 100.0%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Partially within Sevenoaks - High Street Conservation Area (24.72%) Within 200m of 15 listed buildings Within 100m of 11 locally listed assets	
Contamination Issues	Contaminated Land Assessment (former commercial land use)	
Noise Pollution	Noise Assessment (Traffic)	
Air Quality	Air Quality Assessment- impact of air quality on residents and impact on Sevenoaks Town Centre AQMA (traffic will need to go through AQMA)	
Mineral Safeguarding Area	None	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Completely within Sevenoaks Urban Area	

Town and Local Centres	Within 800m of Sevenoaks - Town Centre, Tuns Hill and Sevenoaks Station Within 2km of Riverhead and St Johns.	
Train Station	Within 800m of Sevenoaks Station	

GREEN	AMBER	RED
20	4	2

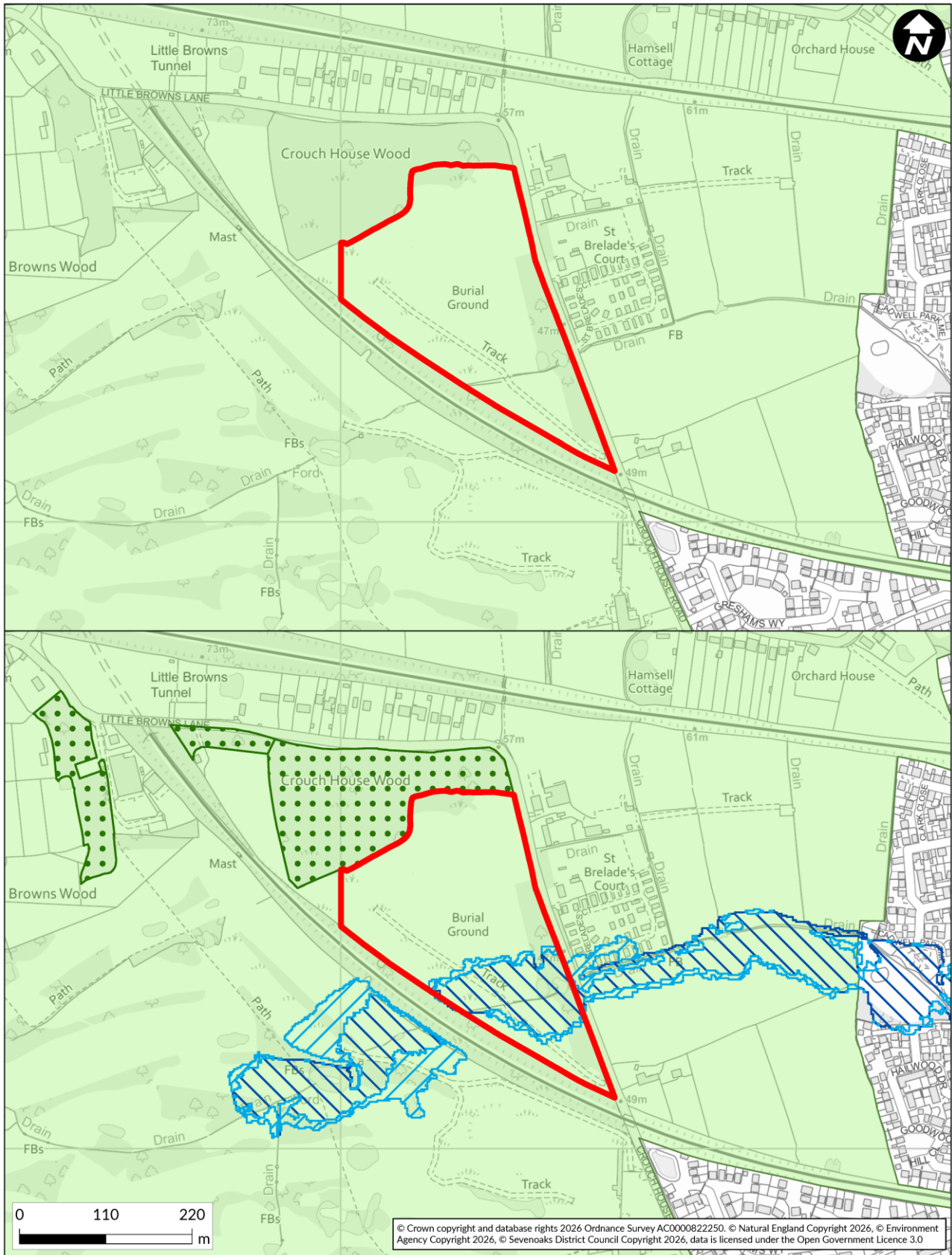
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a brownfield site within the urban confines of Sevenoaks Urban Area, which is identified as the District's principal town in the Settlement Hierarchy. The site is considered to be in a highly sustainable location, within Sevenoaks Town Centre, close to key services and facilities and Sevenoaks Train Station. However, the site is allocated for office use. The site has an existing access off Argyle Road. Due to the existing allocation for office use, and that the proposal does not retain any employment floorspace in this location, this site is considered unsuitable for residential development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is allocated for office use. Therefore, the site is not proposed for allocation for residential use.

HO/21/00121
Land to the West of Crouch House Road, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00121
Site Area (Ha)	6.61
Developable Area (Ha)	6.29
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO426
Site Description	This is a predominantly Green Belt site near Edenbridge. The site comprises the Eden Valley Woodland Burial Ground. The site is bound by the railway to the west and south, woodland to the north and Crouch House Road to the east. There is an existing access off Crouch House Road at the southern point of the site. A footpath runs through the site from the south to the north-west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer adjacent to urban confines of Edenbridge
Stage 1 Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	60.26m from Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	Open spaces 2018 (burial ground)	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-High – 100%	
Agricultural Land Quality	Grade 3 – 100%	
Flood Risk	19.93% in Flood Zone 2 and 15.21% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	6.34% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (former burial ground)	
Noise Pollution	Noise Assessment (railway)	
Air Quality	AQ Assessment- Impact of development on nearby roads	
Mineral Safeguarding Area	No	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	61.76% within 400m of Edenbridge	
Town and Local Centres	800m-2km to Town and Local Centre (walkable and cycle friendly)	
Train Station	Access points within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
11	11	4

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site in the Green Belt close to Edenbridge, which is identified as a town in the Settlement Hierarchy 2025. The site is not directly adjacent to the settlement boundary. The site is considered to be in a sustainable location, close to key services and facilities in Edenbridge, including two train stations. The site is considered to constitute grey belt land under national policy due to its performance against GB purposes A, B and D. However, the site is a burial ground and is an emerging open space designation. It is also within an area of medium-high landscape sensitivity. There is an existing access to the site which could be utilised. Due to the constrained nature of the site, the fact that the site is not directly adjacent to the settlement boundary and the loss of open space and the burial ground, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in Years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is not adjacent to the settlement boundary of Edenbridge, comprises an emerging open space designation (burial ground) and is in an area of medium-high landscape sensitivity. Therefore, the site is not proposed for allocation.

HO/21/00124
Pounsley House, Pounsley Road, Dunton Green, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/21/00124
Site Area (Ha)	0.61
Developable Area (Ha)	0.61
Brownfield / Greenfield	Mixed
Planning History	No relevant planning history
Previous SHELAA Ref (2018)	N/A
Site Description	The site is adjacent to the northern boundary of Sevenoaks urban confines and wholly within the Green Belt. It comprises a detached dwelling, a number of outbuildings and two garden areas. To the north and east is a small ribbon of residential development, while the western boundary is denoted by a railway line. The site has an existing access gate off of Pounsley Road which could be utilised. The southern most portion of the site falls within both Flood Zone 3 and a biodiversity opportunity area.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Sevenoaks Urban Area	
Land Use (GF/PDL)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes but will be reprovided	
Existing allocation / designation	No	
Proposed use / designation	Yes – Open Spaces 2018	
Green Belt	In green belt adjacent to Sevenoaks	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium – 100%	
Agricultural Land Quality	Urban – 100%	
Flood Risk	5.78% Flood Zone 2 18.95% Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land (former landfill site)	
Noise Pollution	Noise Assessment (railway)	
Air Quality	Air Quality Assessment- impact on A25 AQMA (traffic will need to go through AQMA)	
Mineral Safeguarding Area	Within River Terrace Deposits and Sub Alluvial River Terrace	
Site Access	Access not possible	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 400m of Sevenoaks	
Town and Local Centres	Within 800m of Dunton Green Within 2km of Riverhead	
Train Station	Within 2km of Dunton Green	

GREEN	AMBER	RED
13	10	3

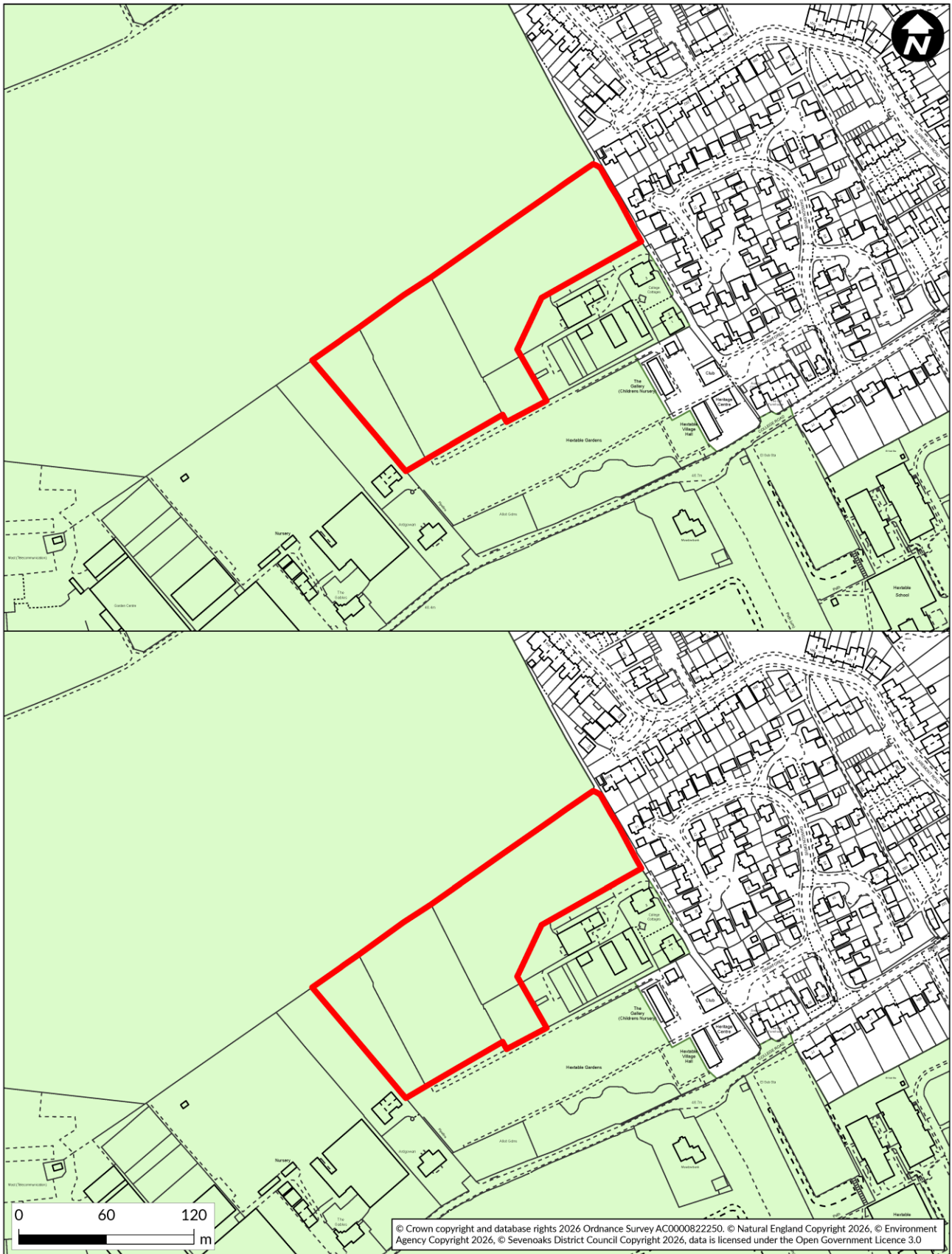
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	The site is located adjacent to the settlement boundary of Dunton Green, in Sevenoaks Urban Area. Sevenoaks Urban Area is identified as the Principal Town in the Settlement Hierarchy and is therefore considered to be the most sustainable settlement in the District, close to key services and facilities and transport connections. The site benefits from an existing access from Pounsley Road, however it is not adopted by KCC, and it is noted that the access is privately owned by the Residents Association who are not supportive of the site, and therefore access to this site is not possible. There is considered to be limited capacity on the transport network and therefore improvements would be required. The site is a partially brownfield site within the Green Belt and is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site lies mostly within a Mineral Safeguarding Area and also within an allocated area of Open Space and these would need further consideration. Due to access not being possible to the site, it is considered to be unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable for development due to access to the site not being possible.

HO/21/00134
Land west of College Cottages, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00134
Regulation 18 2025 Reference	HEX4
Site Area (Ha)	1.9
Developable Area (Ha)	1.9
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO58 / HO20 / HO123
Site Description	This is a greenfield site adjacent to the urban confines of Hextable. The site is currently in use for grazing. The site is bound by agricultural land to the north, residential and agricultural buildings to the east and south. The site does have an existing access, through the adjacent horticultural nursery, off of Crawfords.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hextable	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Hextable	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 2 (72%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 Listed Buildings and within 100m of Hextable Gardens	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New / additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Hextable	
Town and Local Centres	Over 2km from Town or Local Centre	
Train Station	Over 2km of Train Station	

GREEN	AMBER	RED
18	4	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	No responses were received from Statutory Consultees.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hextable Parish Council</u> A response from Hextable Parish Council considers that some of the site is appropriate for developed given its previously used commercial status. However, the response makes further comment on emerging Policies H7 and HEN7 in respect of this site and the adjacent heritage assets as well as emerging Policy T2 in terms of the surrounding strategic road network.
General Response	Major constraints include limited capacity on Dartford Road, Beechenlea Lane and other narrow country lanes, absence of pavements, and infrequent bus and rail services; risking congestion, pollution and car dependency. The sole primary school is oversubscribed, medical practices operate at full capacity and there are no funded plans for expanded utilities, community venues or shops to serve additional households. Permanent loss of green belt and high-quality farmland would undermine wildlife habitats, open space and separation between settlements while development could damage heritage assets and local character. Increased construction traffic may reduce pedestrian safety and air quality, additional housing could heighten surface-water flood risk in a high-risk area. Suggestions include smaller allocations, retention of mature boundaries, use of brownfield sites and distribution of homes to other parishes to preserve rural identity.
Key issues raised	Transport and access Local services and community infrastructure Green Belt and agricultural land Heritage and local character Biodiversity and habitats Construction impacts and safety Public open space and community wellbeing Flood risk and drainage

SITE PROMOTER RESPONSE

Chartwell Land and New Homes 2 Ltd

A response from Chartwell Land and New Homes 2 Ltd, as site promoters, confirms that the site remains available for development and supports the inclusion of the site as an allocation in the Local Plan. The response provides further details regarding the specific site proposals which have been taken account of through the Development Brief work.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Hextable, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities in Hextable, although it is noted that the site lies over 2km from both an allocated local centre and a train station. The site lies fully within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site does not lie within national landscapes, but is Grade 2 agricultural land quality which would need further consideration. The site would also require a new access option and consideration to be given to the adjacent Hextable Gardens and nearby listed buildings. It is considered that this site forms a key part of the strategic gap between Hextable and Swanley and therefore is not considered suitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is a key location within the strategic gap between Hextable and Swanley and therefore is unsuitable for allocation.

HO/21/00137
Land to the west of Manor Lane, Hartley



SITE DETAILS	
SHELAA Reference	HO/21/00137
Site Area (Ha)	2.02
Developable Area (Ha)	2.01
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO151
Site Description	This is a greenfield site adjacent to the urban confines of Hartley. The site comprises a parcel of land containing an area of woodland. The site is bound by Manor Lane to the east, residential development to the north and west and Church Road to the south.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Hartley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hartley	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the green belt adjacent to Hartley	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium – 100%	
Agricultural Land Quality	Urban – 100%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	Within 250m of Hartley	
Town and Local Centres	Within 800m of Hartley, Cherry Trees Within 2km of New Ash Green, Village Centre	
Train Station	Over 2km from a train station	

GREEN	AMBER	RED
19	3	4

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Hartley, which is identified as a Primary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities in Hartley. The site is within the Green Belt and is considered to be grey belt land under national policy. However, access to the site is considered to be difficult and there is no capacity on the surrounding transport network. It is considered that the lack of capacity would restrict development opportunities, both for access for workmen and for future residents. Due to access and capacity issues the wider parcel is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable Do not include in Plan
SDC Comments	The wider parcel is not considered suitable for development due to access and capacity issues. SDC reconsidered the site boundary of this submission as part of the Regulation 18 Part 2 consultation (Autumn 2023) and for completeness, this parcel has also been reassessed in the 2025 SHELAA.

HO/21/00137/B
Land to the west of Manor Lane, Hartley

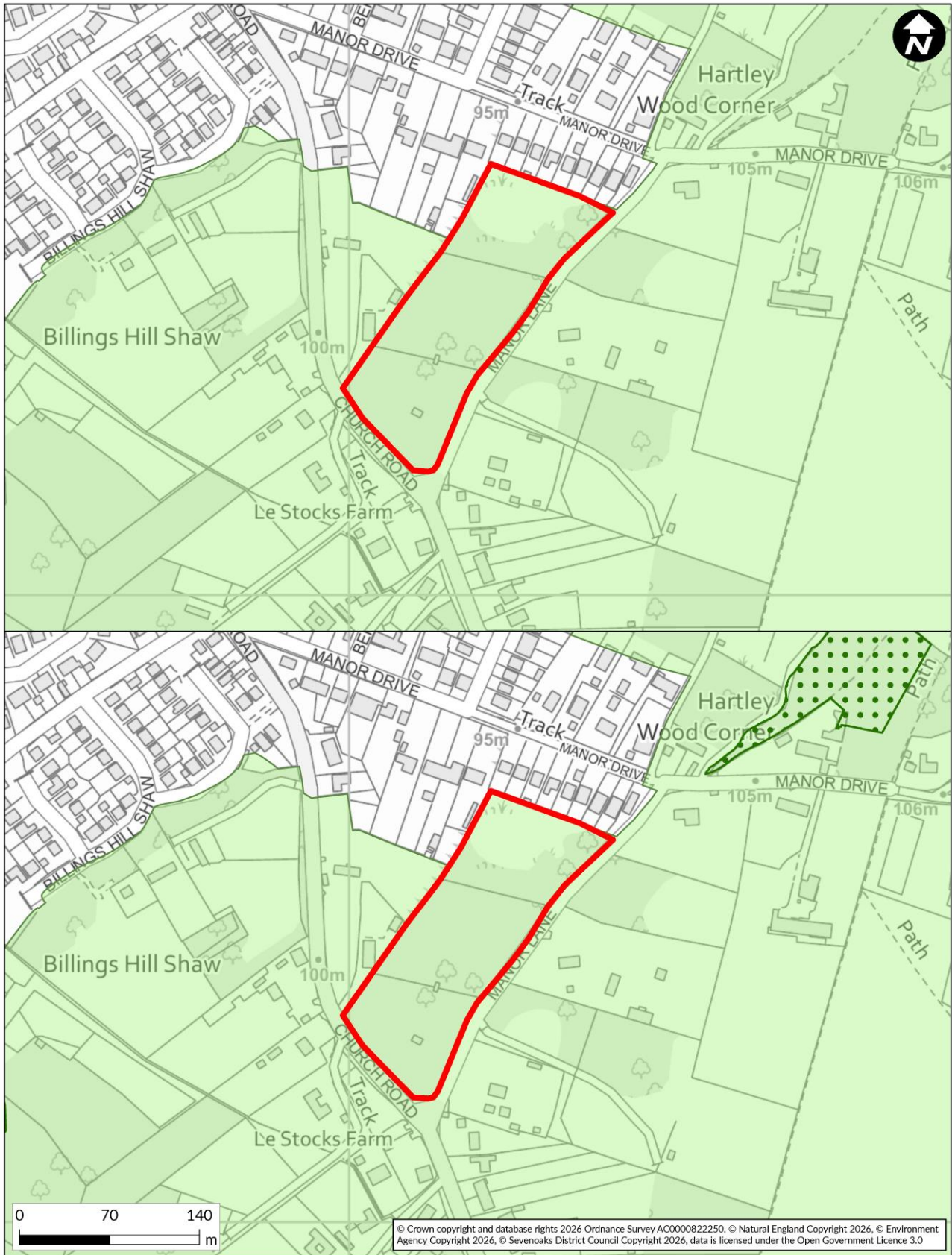
SHELAA 2026 CONCLUSIONS

Suitability	The reduced site boundary was assessed in the SHELAA 2023, following the recommended area for release from the Green Belt. However, the reduced parcel is also considered
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	to have difficult access and no capacity on the transport network. Therefore, the site is now considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The reduced parcel is not considered suitable for development due to access and capacity issues.

HO/21/00137
Land to the west of Manor Lane, Hartley



SITE DETAILS	
SHELAA Reference	HO/21/00137
Site Area (Ha)	2.02
Developable Area (Ha)	2.01
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO151
Site Description	This is a greenfield site adjacent to the urban confines of Hartley. The site comprises a parcel of land containing an area of woodland. The site is bound by Manor Lane to the east, residential development to the north and west and Church Road to the south.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Hartley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hartley	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the green belt adjacent to Hartley	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium – 100%	
Agricultural Land Quality	Urban – 100%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	Within 250m of Hartley	
Town and Local Centres	Within 800m of Hartley, Cherry Trees. Within 2km of New Ash Green, Village Centre	
Train Station	Over 2km from a train station	

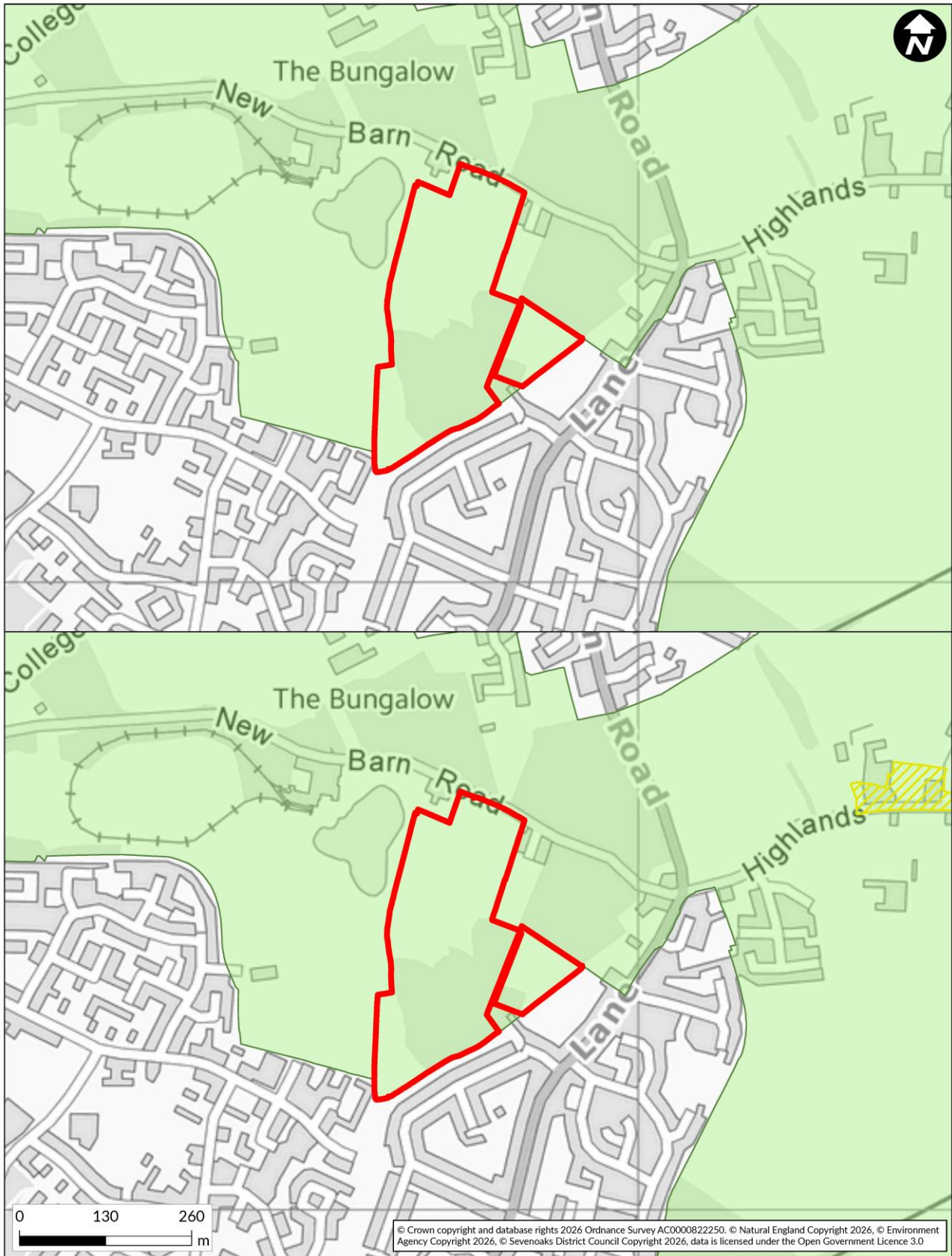
GREEN	AMBER	RED
19	3	4

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Hartley, which is identified as a Primary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities in Hartley. The site is within the Green Belt and is considered to be grey belt land under national policy. However, access to the site is considered to be difficult and there is no capacity on the surrounding transport network. It is considered that the lack of capacity would restrict development opportunities, both for access for workmen and for future residents. Due to access and capacity issues the wider parcel is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The wider parcel is not considered suitable for development due to access and capacity issues. SDC reconsidered the site boundary of this submission as part of the Regulation 18 Part 2 consultation (Autumn 2023) and for completeness, this parcel has also been reassessed in the 2025 SHELAA.

HO/21/00140
Land to the east of Swanley Park New Barn Road Swanley



SITE DETAILS	
SHELAA Reference	HO/21/00240
Site Area (Ha)	7.64
Developable Area (Ha)	2.98
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO141
Site Description	This is a greenfield site adjacent to the urban confines of Swanley. The site comprises a large area of woodland. The site is bound by New Barn Road to the north, residential development to the east and south and Swanley Park to the west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Swanley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Swanley	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Green belt adjacent to Swanley	
Green Belt Stage 3	Not considered grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium 99.56%	
Agricultural Land Quality	Grade 2 – 61.0%. Urban – 39%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	56.87% within 100m of Swanley Park Kent Compendium historic park / garden	
Contamination Issues	Cont Land Assessment (former nursery site)	
Noise Pollution	No specific risk	
Air Quality	Air Quality Assessment- Impact on Swanley AQMA/ impact on neighbouring junctions	
Mineral Safeguarding Area	None	
Site Access	New/Additional access	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	100.0% within 400m of Swanley	
Town and Local Centres	Access points within 2km of Hextable, Upper Main Road and Swanley – Town Centre	
Train Station	Access point within 2km of Swanley	

GREEN	AMBER	RED
15.5	9	2.5

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site in the Green Belt adjacent to Swanley, which is identified as a town in the Settlement Hierarchy. The site is considered to be in sustainable location, close to key services and facilities and Swanley Train Station. The site lies fully within the Green Belt and is not considered to constitute grey belt land due to performing strongly against Green Belt purpose B, preventing the merging of Swanley and Hextable. Additionally, the site is 61% Grade 2 Agricultural Land Quality. Due to the constrained nature of the site in the Green Belt, the site is not considered to be suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is highly constrained by strongly performing Green Belt and Grade 2 Agricultural Land Quality. Therefore, the site is not proposed for allocation.

HO/21/00151
Gorse Hill Nursery, Gorse Hill, Farningham



SITE DETAILS	
SHELAA Reference	HO/21/00151
Site Area (Ha)	1.38
Developable Area (Ha)	1.38
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO315
Site Description	This is a brownfield site in the Green Belt, not adjacent to a settlement confines. The site currently comprises a former plant nursery in horticultural use, with a large area of hardstanding and associated buildings. The site is also occupied by storage for caravans. The site is bound by open countryside to the north, south and west and the A20 to the east. The site has an existing access from a layby off Gorse Hill Main Road (A20).
Site Type	New build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – previously developed land
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Grade 3	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	Contaminated land assessment – former land use	
Noise Pollution	Noise assessment - traffic	
Air Quality	No specific risk	
Mineral Safeguarding Area	Within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	In open countryside	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
16	5	5

SHELAA 2026 ASSESSMENT

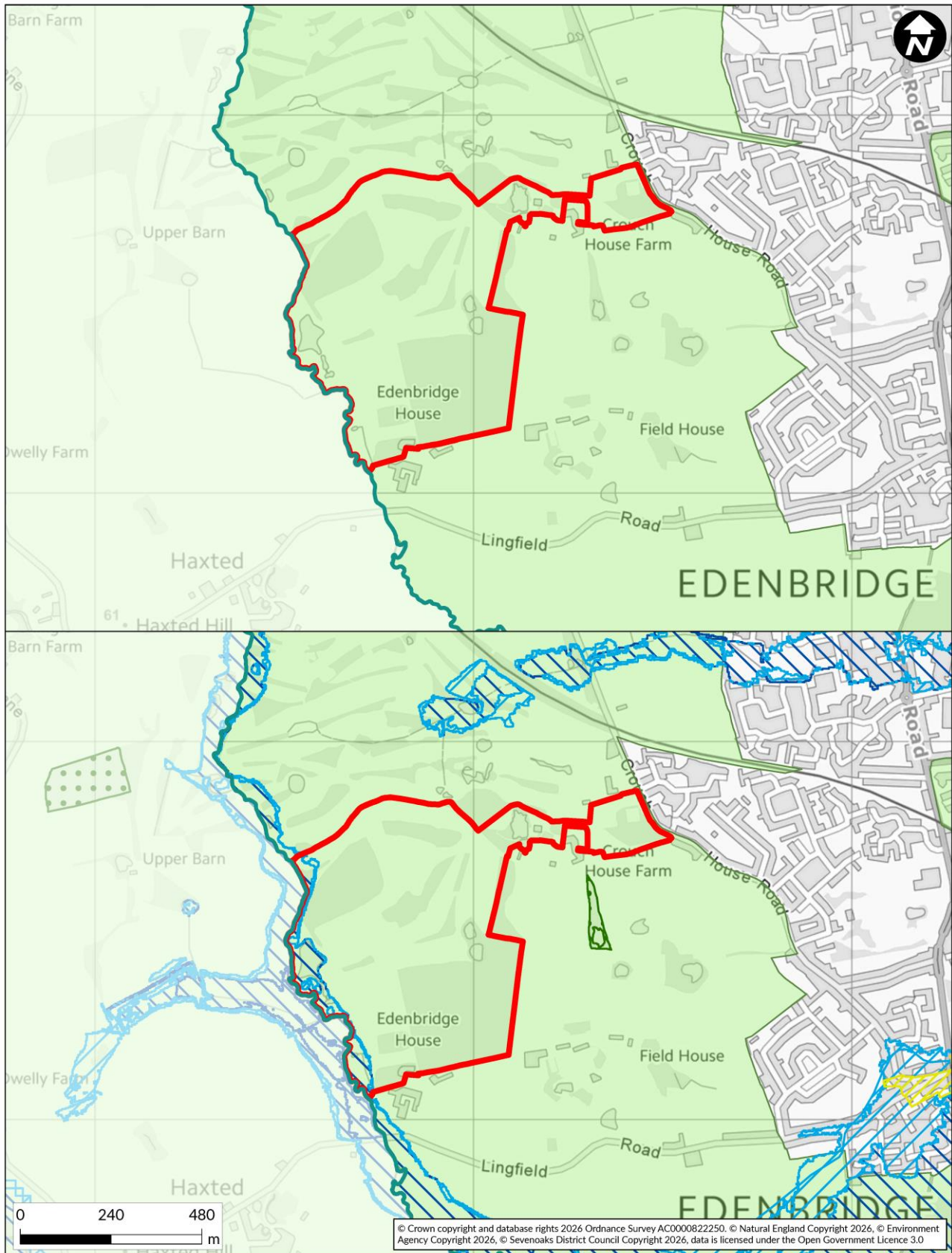
SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site in the open countryside. The site is therefore not considered to be in a sustainable location, and is over 2km from a town or local centre and a railway station. The site is within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site lies fully within national landscapes. A contaminated land assessment and noise assessment would be required. Therefore, due to the sites unsustainable location within National Landscapes, the site is considered unsuitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is located in an unsustainable location and in national landscapes and therefore is not considered suitable for allocation.

HO/21/00162

Skeynes Land adjacent to Kent & Surrey Golf Course, Crouch House Road, Edenbridge, Kent
TN8 5LQ



SITE DETAILS	
SHELAA Reference	HO/21/00162
Site Area (Ha)	39.54
Developable Area (Ha)	39.54
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO330
Site Description	This is a greenfield site adjacent to the urban confines of Edenbridge. The site comprises a large parcel of land to the west of Edenbridge, also directly adjacent to the district boundary with Tandridge District. The majority of the site comprises a redundant golf course, with the remaining land, to the east of the site, forming part of the curtilage to Crouch House Farm and tennis courts. The site is bound by Crouch House Road to the east, a golf course to the north and open countryside to the west and south.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	9.19m from Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within green belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-High – 96.99%	
Agricultural Land Quality	Grade 3 – 99.8%	
Flood Risk	7.7% in Flood Zone 2 and 5.91% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within a LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 3 listed buildings	
Contamination Issues	Contaminated Land Assessment (likely made ground)	
Noise Pollution	Noise Assessment (adjacent commercial)	
Air Quality	AQ Assessment- Impact of development on nearby roads dependant on scale and density	
Mineral Safeguarding Area	40569.32m2 10.26% within Sub Alluvial River Terrace	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	10.58% within 400m of Edenbridge	
Town and Local Centres	Access points within 2km of Edenbridge Central, Northern Fringe and Southern Fringe	
Train Station	Access points within 2km of Edenbridge and Edenbridge Town	

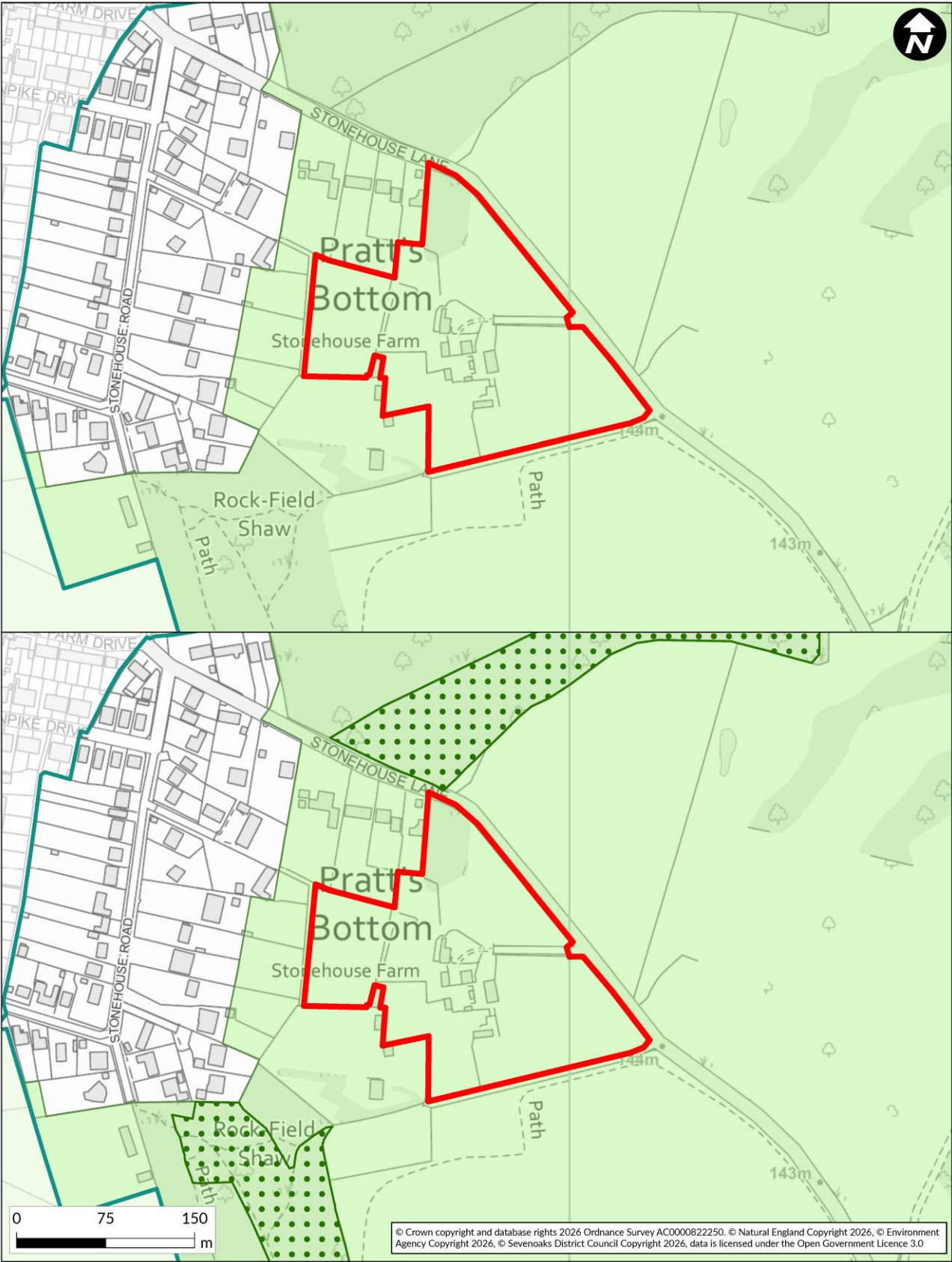
GREEN	AMBER	RED
11	12	4

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, as well as benefitting from access to two train stations. The site lies fully within the Green Belt and is considered to be grey belt land under national policy due to its performance against Green Belt purposes A, B and D. The site is also medium-high landscape sensitivity, and there is considered to be no capacity on the surrounding transport network as well as access to the site being difficult. However, the site is considered to present an unnatural extension to the urban confines of Edenbridge and therefore the site is not considered to be suitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site would present an unnatural extension to the urban confines of Edenbridge and therefore is considered to be unsuitable for allocation.



SITE DETAILS	
SHELAA Reference	HO/21/00163
Site Area (Ha)	3.78
Developable Area (Ha)	3.78
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site in Pratts Bottom. The site comprises a former commercial stud farm with a range of building, as well as two residential properties. The site is bound by Stonehouse Lane to the north and east, residential to the west and agricultural to the west and south. There is an existing access off Stonehouse Lane.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of urban confines to Pratts Bottom
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (adjacent to Pratts Bottom)	
Land Use (GF/PDL)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Completely within the Green Belt	
Green Belt Stage 3	Strongly performing Green Belt	
National Landscape	Not within National Landscape	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban - 8.75%; Grade 3 - 91.25%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	0.45% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (appears to be a former quarry)	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	69.64% within 400m of Greater London Large Built-Up Area	
Town and Local Centres	Over 2km to Town and Local Centre	
Train Station	At least 1 proposed access point is within 2km of Knockholt Station (walkable and cycle friendly)	

GREEN	AMBER	RED
15	7	5

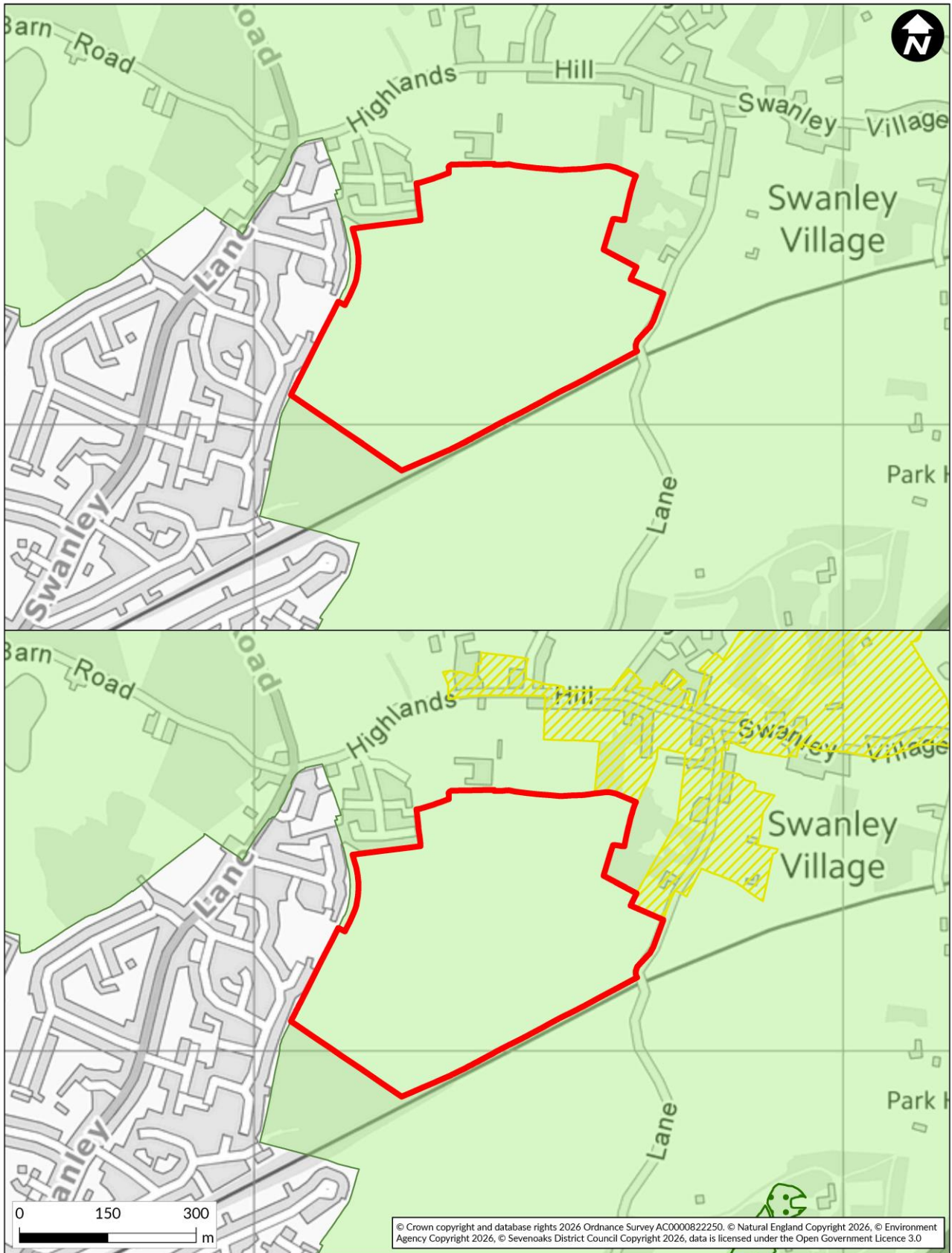
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a majority greenfield site near to the urban confines of Pratts Bottom, which is identified as a Secondary Service Centre in the Settlement Hierarchy 2025. It is therefore considered that the site is in a sustainable location, close to key services and facilities. The site is also within walking distance of Knockholt Station. The site is fully within the Green Belt and is not considered to constitute grey belt land, due to it performing strongly against Green Belt purpose A (restricting the sprawl of the large built up area of Greater London). The site does not lie within National Landscapes and does not have any other land constraints which would make this site unsuitable, although it is noted that the site will need a contaminated land assessment. Site access and network capacity issues have been identified. Accordingly, and due to being strongly performing Green Belt, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered to be strongly performing Green Belt land and has access and capacity issues. Accordingly the site is considered unsuitable.

HO/21/00165
Land north of Beechenlea Lane, Swanley



SITE DETAILS	
SHELAA Reference	HO/21/00165
Regulation 18 2025 Reference	SWAN14
Site Area (Ha)	20.7
Developable Area (Ha)	20.7
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO84, MX54b
Site Description	This is a greenfield site adjacent to the urban confines of Swanley. The site comprises a large parcel of land containing an agricultural field, use for arable crop production. The site is bound by Archer Way to the west, railway Lane to the south, Beechenlea Lane to the east and open countryside to the north.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Swanley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (adjacent to Swanley)	
Land Use (GF/PDL)	Greenfield	
Existing use	Arable land /No existing allocated use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Swanley	
Green Belt Stage 3	Grey belt	
National Landscape	Not within National Landscape	
Landscape Sensitivity	99.55% Low - Medium	
Agricultural Land Quality	Grade 2 - 100.0%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	37.41% within 200m of Swanley Village conservation area; Within 200m of 6 listed buildings	
Contamination Issues	Contaminated Land Assessment (former farm land)	
Noise Pollution	Noise Assessment (railway)	
Air Quality	Air Quality Assessment- Impact on Swanley AQMA	
Mineral Safeguarding Area	9.37% within River Terrace Deposits	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	84.86% within 400m of Swanley	
Town and Local Centres	Within 2km of Hextable, Upper Main Road; within 2km of Swanley - Town Centre (walkable and cycle friendly)	
Train Station	Within 2km of Swanley Station (walkable and cycle friendly)	

GREEN	AMBER	RED
13	10	3

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site falls within the setting of the Kent Downs National Landscape, as well as containing a Public Right of Way. Comments are also provided on the cumulative impacts of development. <u>National Grid Electricity Transmission</u> A response from National Grid Electricity Transmission highlights that the site contains decommissioned DC cable: Kingsnorth Beddington.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Swanley Town Council</u> A response from Swanley Town Council strongly objects to the site, highlighting the importance of this site in separating Swanley Village and Swanley. The response raises concerns regarding grey belt classification and green belt policy, proximity to Hextable, the Swanley Neighbourhood Plan, access issues, lack of development brief, Grade 2 agricultural land, water retention, topography and biodiversity as well as the visual impact of the proposal.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP sets out that the site is crucial in maintaining the physical and visual separation between Swanley and Swanley Village. The response also highlights concerns regarding the Swanley Village Conservation Area, Swanley Neighbourhood Plan, proximity of the site to Hextable, Grade 2 agricultural land, challenging access and the cumulative impact on infrastructure.
General Response	Respondents highlight capacity issues on local roads and highways, noting that narrow lanes, a single-lane railway bridge and peak-time queues would worsen with construction and

	residential traffic without secured mitigation, while drainage and sewer networks risk being overwhelmed and flood-risk measures are not secured. They note that developing grade 2 farmland and green belt land would undermine food security and the rural economy, harm landscape openness, heritage assets and wildlife corridors. Development would also overburden schools, healthcare and utilities, and disrupt public footpaths. Concerns regarding long-term amenity during extended construction, and that alternative brownfield or underused sites with clearer delivery plans should be prioritised.
	Highways and access Best and Most Versatile (BMV) agricultural land and food security Heritage, landscape and visual amenity Local services, community facilities and utilities capacity Biodiversity, habitats and ecological networks Green Belt / land reclassification and plan soundness Construction, long-term amenity and public rights of way Flooding and drainage

SITE PROMOTER RESPONSE

Iceni Projects on behalf of Bellway Strategic Land

A response from Iceni Projects on behalf of Bellway Strategic Land, as the site promoted, confirms strong support for the proposed allocation in the regulation 18 consultation and confirms support for the overall development strategy, local housing need and approach to grey belt. The site is confirmed to be available for development within the Plan period and the response provides further detail with regard to the site specific proposals.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Swanley, which is identified as a town in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, as well as within 2km of Swanley Train Station. The site is fully within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site is Grade 2 Agricultural Land Quality, but this on its own is not considered an overriding constraint. The site is in close proximity to Swanley Village
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	Conservation Area, which is considered to cause unacceptable harm to the heritage asset. The site does not lie within National Landscapes. The site would also require contaminated land, noise and air quality assessments should a scheme come forward. There are no other constraints which would make this site unsuitable. However, due to the sites proximity and potential harm to the Swanley Village conservation area, the site is considered unsuitable and a revised boundary has been considered.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to its proximity to Swanley Village Conservation Area and the potential heritage impact associated with this.

HO/21/00174
Land at and south of allotment gardens, Victoria Drive, Southdowns



SITE DETAILS	
SHELAA Reference	HO/21/00174
Site Area (Ha)	1.26
Developable Area (Ha)	1.26
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO394
Site Description	This is a greenfield site within the buffer of South Darenth urban confines. The site currently comprises allotments and a large area of greenfield land, with mature trees. The site is bound by Southdowns Retirement community to the north, Skinney Lane to the west and open countryside to the east and south. The site does not currently benefit from a vehicular access.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of South Darenth urban confines
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent South Darenth	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes, but not allocated (allotments)	
Existing allocation / designation	No	
Proposed use / designation	Open Spaces 2018: Victoria Drive Allotments	
Green Belt	In the Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage asset	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent South Darenth	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
19	3	5

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site within the buffer of South Darenth urban confines, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although it is noted that it lies 2km from both a town or local centre and a railway station. The site is within the Green Belt and is considered to be grey belt land under national policy. However, the site is a designated open space – allotments and therefore the loss of this use would not be supported. Therefore, due to the constrained nature of the site it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is designated allotments and is therefore not considered suitable for development.



SITE DETAILS	
SHELAA Reference	HO/21/00186
Regulation 18 2025 Reference	WK1
Site Area (Ha)	1.36
Developable Area (Ha)	1.36
Brownfield / Greenfield	Mixed
Planning History	1 temporary Gypsy and Traveller pitch (22/01447/FUL)
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield Green Belt site adjacent to the urban confines of West Kingsdown, currently used as grazing land, with a yard to the southern boundary. There is an existing access off London Road. There is currently one Gypsy and Traveller pitch for temporary use located on the site. The site is bound by residential to the south and east, London Road to the west. The north of the site is screened by a substantial tree buffer.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of West Kingsdown
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to West Kingsdown	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to West Kingsdown	
Green Belt Stage 3	Grey belt	
National Landscapes	Within 100m buffer of Kent Downs National Landscapes	
Landscape Sensitivity	Medium	
Agricultural Land Quality	Urban - 27.34% Other - 17.8% Grade 3 - 54.86%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Scheduled Monument Two milestones at West Kingsdown	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within 250m of West Kingsdown	
Town and Local Centres	Within 800m of West Kingsdown, Hever Road	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
17.5	6.5	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site falls within the setting of the Kent Downs National Landscapes as well as containing Priority Habitats Inventory – Deciduous Woodland to the east of the site.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>West Kingsdown Parish Council</u> A response from West Kingsdown Parish Council agrees with the proposed site allocation and sets out specific comments around foul drainage and sewerage infrastructure requirements.
General Response	Respondents highlighted the loss of deciduous woodland and the potential disruption to insect activity if development proceeds, noting policy requirements for priority habitats. They pointed to increased air and noise emissions from at least thirty additional vehicles on London Road and risk of network congestion during peak events or incidents, calling for new access arrangements. A scheme of up to fifteen dwellings was preferred as it aligns with the existing village pattern and avoids abrupt density changes. Adequate foul drainage into the main sewer north of Neal Road was deemed essential to prevent flooding. The site falls within the Kent Downs National Landscape, and concerns were raised about loss of greenfield land. In addition concerns were raised about poor public transport leading to social isolation and limited utility and medical capacity.
Key issues raised	Biodiversity and priority habitats Noise and air pollution Highways, access and network capacity Scale, density and utilities capacity Landscape setting and visual impact (Kent Downs National Landscape)

	Loss of agricultural/greenfield land Public transport, connectivity and social inclusion
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SITE PROMOTER RESPONSE

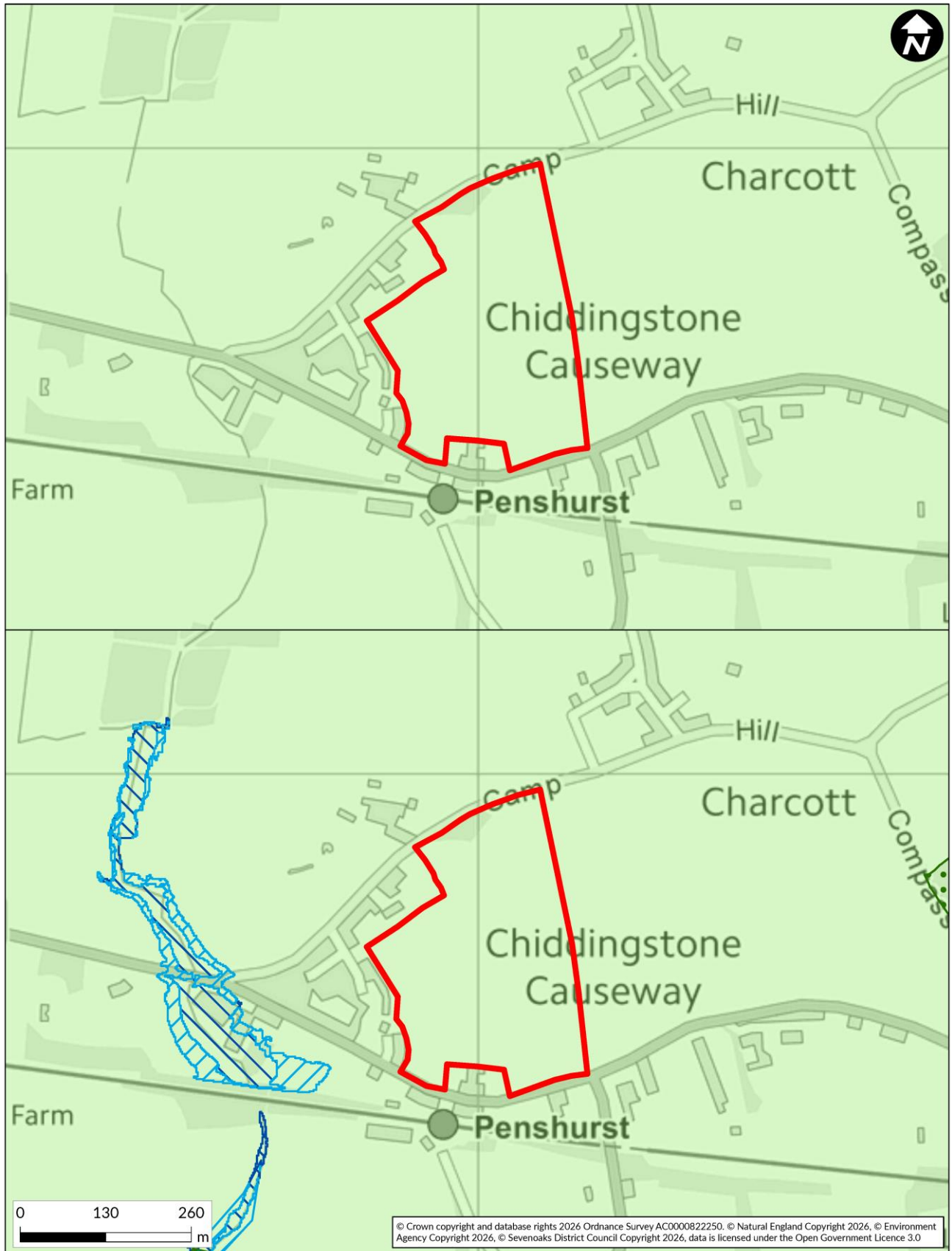
No response was received from the site promoter.

SHELAA 2026 CONCLUSIONS

Suitable?	The site is located adjacent to the settlement boundary of West Kingsdown, which is a Secondary Service Settlement in the Settlement Hierarchy 2025, and therefore the site is considered to be in a sustainable location, close to key services and facilities, although it is noted that the site lies over 2km from a train station. The site is greenfield Green Belt land and is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. There is currently one Gypsy and Traveller pitch for temporary use on the site and consideration will need to be given to the reprovision / relocation of this use or an evidenced justification for the loss of this use. There is considered to be capacity on the surrounding transport network, and there is an existing access to the site from London Road, however it is considered that a new access to the site would be required. There are no other constraints which would make the site unsuitable. Due to the unconstrained nature of the site, its grey belt status and its location adjacent to the West Kingsdown, the site is considered to be suitable for development.
Availability	There are currently concerns regarding site availability and legal land ownership and therefore the site is unable to be demonstrated as available.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is not considered available in the plan period due to outstanding land ownership queries and therefore cannot be considered suitable for allocation.

HO/21/00188
Land to the rear of Little Brown Jug, Chiddingstone Causeway



SITE DETAILS	
SHELAA Reference	HO/21/00188/B
Regulation 18 2025 Reference	CC3
Site Area (Ha)	9.99
Developable Area (Ha)	9.99
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO421 and MX11
Site Description	This is a large greenfield site adjacent to Chiddingstone Causeway. The site is currently in use as agricultural land and has a Public Right of Way running along the eastern boundary of the site. The site is bound by Camp Hill to the north, agricultural land to the east, the B2027 and community use (Public House) to the south and residential development to the west. The site does not currently benefit from an existing vehicular access.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within 250m of Penshurst Station
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt not adjacent to urban confines	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Grade 3	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 7 listed buildings	
Contamination Issues	Contaminated land assessment – former land use on part of site	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New access required	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Adjacent Chiddingstone Causeway	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Within 800m of Penshurst Station	

GREEN	AMBER	RED
15	7	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response received from Natural England highlights that the site falls within the setting of the High Weald National Landscape and provides further advice.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Chiddingstone Parish Council</u> A response from Chiddingstone Parish Council strongly objects to the allocation, citing the Settlement Hierarchy, Sustainability, Education, National Landscapes, Green Belt, Landscape, Heritage, Agricultural Land Classification and Drainage as areas of concern. <u>Leigh Parish Council</u> A response from Leigh Parish Council supports the objections made by Chiddingstone Parish Council, highlighting the size of the development, Sustainability and Transport, Green Belt, National Landscape and Agricultural Land as key areas of concern. <u>Sevenoaks Weald Parish Council</u> A response from Sevenoaks Weald Parish Council highlights support for the response made by Chiddingstone Parish Council, highlighting that the number of new homes could significantly impact traffic movements from Weald towards Sevenoaks.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent objects to the proposed allocation, raising concerns regarding the services availability at Penshurst Station, as well as sustainability, National Landscapes and their setting. <u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP highlights that the site represents significant growth in Chiddingstone Causeway and cites key issues including flooding, suitability of the road network and GP provision as well as education facilities.

General Response	Respondents consider the scheme excessive given the hamlet's limited services and infrastructure, suggesting capacity for around 6 dwellings to maintain rural character. Local roads are narrow, unlit and prone to flooding, public transport is infrequent and reliance on private cars may undermine highway safety and sustainability. Primary schools, GP surgeries, shops and utilities are reported at capacity, with no firm delivery plans for new facilities. The site's washed-over Green Belt status, role in national landscape settings and local food production value are emphasised, pointing to infill on previously developed land rather than boundary changes. Flood risk on Wealden clay subsoil and deficient drainage could exacerbate runoff. Biodiversity concerns include protected badger setts, loss of habitats for ground-nesting birds and challenges meeting net-gain requirements.
Key issues raised	Transport and access Scale, settlement fit and local character Local services and utilities capacity Landscape, heritage and visual character Deliverability, evidence base and plan-making compliance Flood risk and surface-water drainage Agricultural land, Green Belt/grey belt classification and food security Biodiversity, ecology and dark skies

SITE PROMOTER RESPONSE

Batchellor Monkhouse on behalf of The Redleaf Trust

A response from Batchellor Monkhouse on behalf of The Redleaf Trust, as the site promoter, confirms that the site remains available for inclusion in the Local Plan and supports the allocation at the Regulation 18 consultation. The response provides further details and information on the emerging proposals as well as comment on the wider Local Plan.

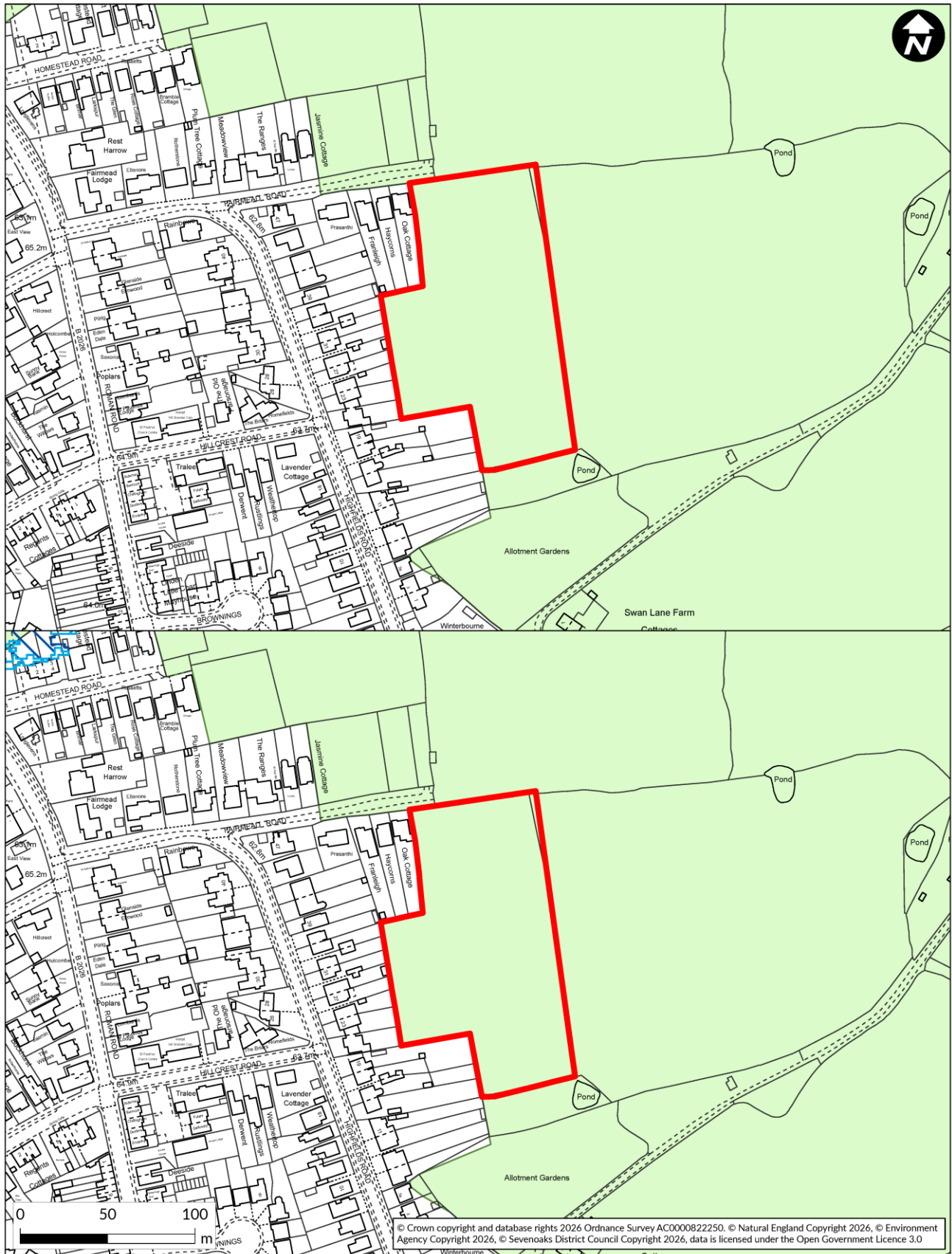
SHELAA 2026 CONCLUSIONS

Suitable?	This is a large greenfield site situated in Chiddingstone Causeway, which is classified as a hamlet in the Settlement Hierarchy 2025. Therefore, it is noted that the site does not lie within a top tier settlement and is over 2km from the nearest town and local centre. However, it is noted that there are a small number of services available in Chiddingstone Causeway and the
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	site is very well located in terms of public transport, being within walking distance of Penshurst Station, and therefore this location is considered to be sustainable. The site would require new vehicular access and consideration will need to be given to the capacity on the surrounding road network. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against Green Belt purposes A, B and D. A contaminated land assessment would be required for this site due to the former land use on part of the site. It is noted that the site lies within Grade 3 Agricultural Land Quality and within 200m of 7 listed buildings, both of which would require further consideration for any future proposals. A potential significant impact is noted with regard to the Listed Church at St Lukes C of E Church on the B2027. The site will also require consultation due to the SSSI Impact Zone. The site does not lie within the National Landscapes and it is not considered that there are any other constraints which would make this site unsuitable for development. Due to the potential heritage impacts of the site as well as the cumulative impact of development on a hamlet, the wider site is not considered suitable for development, although a smaller boundary of this site has been reconsidered under HO/21/00188/B.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The wider site is considered unsuitable due to the potential heritage impact of the site and the cumulative impact of development on the hamlet of Chiddingstone Causeway.

HO/21/00190/B
Land at Swan Lane, Edenbridge (wider site)



SITE DETAILS

SHELAA Reference	Please see MX/24/00002 for site assessment, this wider portion of the site has been superseded.
Site Area (Ha)	
Developable Area (Ha)	
Brownfield / Greenfield	
Planning History	
Previous SHELAA Ref (2018)	
Site Description	
Site Type	
When will this development be delivered?	
SHELAA Yield	
SHELAA Conclusion	

HO/21/00190/B

Land to the north of Swan Lane and east of Fairmead Road

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	The reduced site boundary was consulted upon as part of the Regulation 18 Part 2 consultation, and was amended from the wider boundary due to the area of land recommended for release from the Green Belt. However, this site has since been superseded by MX/24/00002. In any case, access to this smaller portion of the site was found to be difficult to the private road. The smaller portion of the site is therefore considered to be unsuitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This is the smaller parcel of the wider site and is considered to be unsuitable due to difficult access.

HO/21/00203
Hopgarden Farm, Telston Lane, Otford, TN14 5JZ



SITE DETAILS	
SHELAA Reference	HO/21/00203
Site Area (Ha)	0.54
Developable Area (Ha)	0.54
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site adjacent to the urban confines of Otford. The site comprises a parcel of woodland. The site is bound by residential to the north and south, Telston Lane to the west and agricultural land to the east.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Otford
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to Otford)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt but adjacent to Otford	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Medium	
Agricultural Land Quality	Urban - 1.59%; Grade 3 - 98.41%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	100.0% within 250m of Otford	
Town and Local Centres	Within 2km of Dunton Green and Otford High Street (walkable and cycle friendly)	
Train Station	Within 2km of Dunton Green and Otford Station (walkable and cycle friendly)	

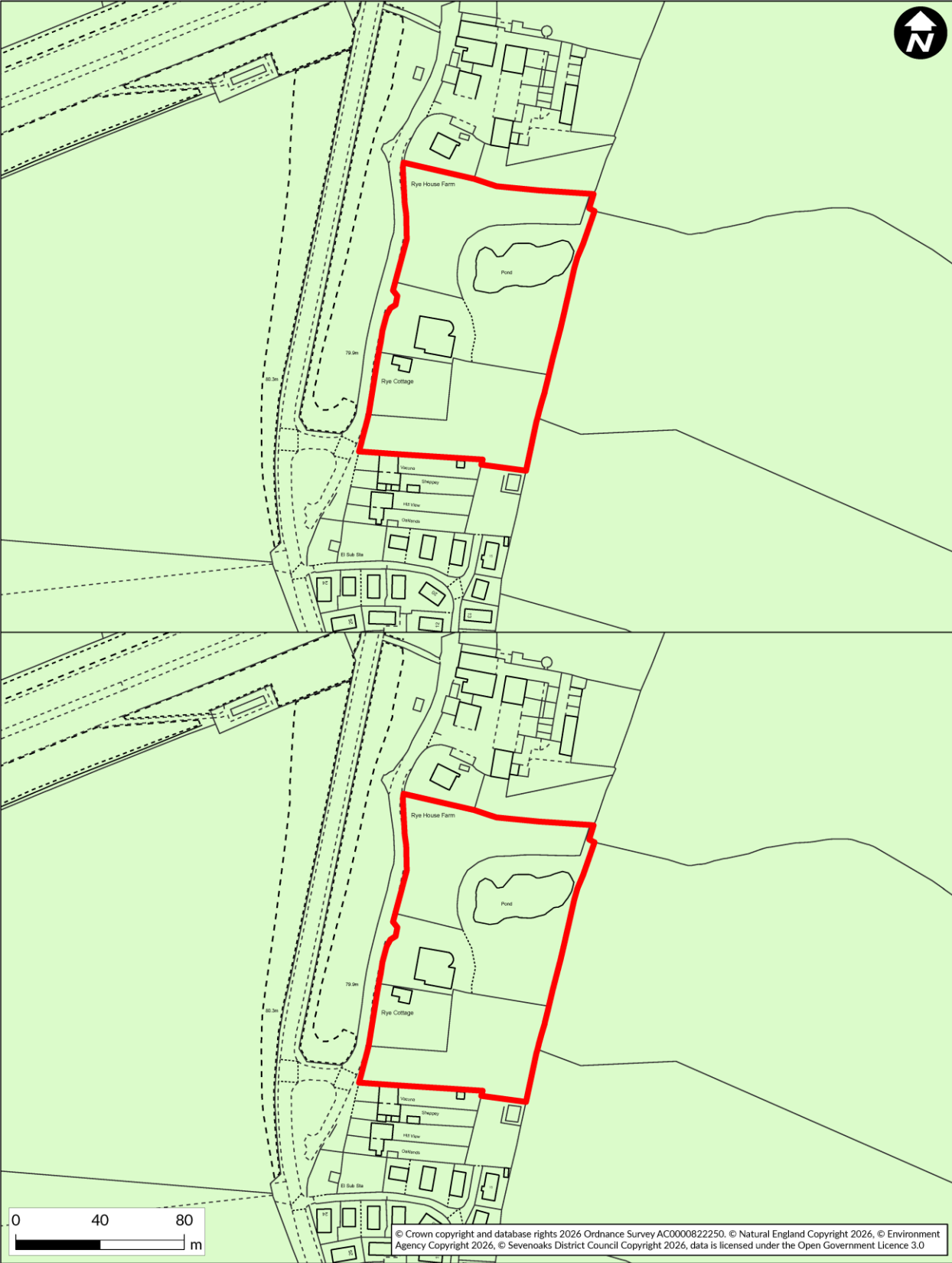
GREEN	AMBER	RED
17	7	3

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Otford, which is identified as a Local Service Centre in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, including Dunton Green and Otford Station. The site is within the Green Belt and is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. However, it is considered that there is no capacity on the surrounding transport network. Additionally, the proposed access off Telston Lane is considered to be difficult due to being a private road. Due to access and capacity issues, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	There are access and capacity issues for the site. Therefore, the site is not proposed for allocation.

HO/21/00204
Rye Cottage, Rye Lane, Dunton Green



SITE DETAILS	
SHELAA Reference	HO/21/00204
Regulation 18 2025 Reference	SEV16
Site Area (Ha)	1.1
Developable Area (Ha)	1.1
Brownfield / Greenfield	Partially Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a partially brownfield site to the north of Sevenoaks Urban Area. The site currently comprises one residential dwelling and associated land. The site is bound by residential use to the north and south, open countryside to the east and west, and Rye Lane to the west. The site benefits from an existing access off Rye Lane.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to strategic site HO/25/00012
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Partially PDL	
Existing use	Yes but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 3	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Contains Listed Building RYE COTTAGE	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment – possible noise from M26	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Not adjacent to settlement	
Town and Local Centres	Within 2km of Dunton Green and Otford High Street	
Train Station	Within 2km of Dunton Green	

GREEN	AMBER	RED
16	8	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site falls within the setting of the Kent Downs National Landscape.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Riverhead Parish Council</u> A response from Riverhead Parish Council supports the need for new housing but strongly objects to the scale and concentration of proposed developments in Riverhead and Dunton Green, warning that around 1,800 new homes would overwhelm already strained infrastructure. The Council highlights severe traffic congestion, road safety risks and insufficient capacity in local schools, healthcare and community services. It also raises concerns about environmental harm, including on the nearby wildlife reserve and an imbalance in growth across the District. The response stresses that significant mitigation measures, such as transport improvements, expanded public services, biodiversity protections and fair allocation of developer funding are essential to avoid serious negative impacts on the area.
Other Consultation Bodies	<u>Kent Wildlife Trust</u> A response from Kent Wildlife Trust considers the site unsuitable for development, cumulatively with surrounding allocations, due to major constraints, including its location within Flood Zone 3 and strong Green Belt role, alongside significant ecological impacts on the Sevenoaks Wildlife Reserve and River Darent. Development would fragment habitats, reduce ecological connectivity, harm species through loss of foraging and nesting areas, and increase pollution and recreational pressure, particularly affecting the sensitive chalk stream. Overall, the response raises environmental and policy concerns that would require extensive mitigation if development were pursued.
General Response	Respondents note that local roads and junctions already exceed capacity and that public transport links are constrained. They highlight that development would erode Green Belt land and countryside buffers, risk settlements merging and alter the

	landscape character. Respondents caution that ecological corridors around the Sevenoaks Wildlife Reserve and SSSI could be harmed and highlight that schools, GP surgeries and other community services near Dunton Green and Otford are near capacity. Additionally, there are concerns that water, sewage and power networks may not support additional dwellings. Concerns over flood risk in a flood zone highlight the need for detailed drainage proposals. Respondents stress the need for robust green and blue infrastructure, strict pollution controls during construction and transparent planning measures.
Key issues raised	Transport and highway capacity Landscape character, Green Belt/greenfield loss and settlement coalescence Ecological impacts and habitat connectivity (SSSI/reserve) Local social infrastructure and capacity (schools, GPs, health services) Flood risk and surface-water management Green and blue infrastructure, buffers and recreational pressure Utility networks and wastewater capacity Construction impacts and pollution control

SITE PROMOTER RESPONSE

A response from the landowner confirms the site as available for allocation in the Local Plan.

SHELAA 2026 CONCLUSIONS

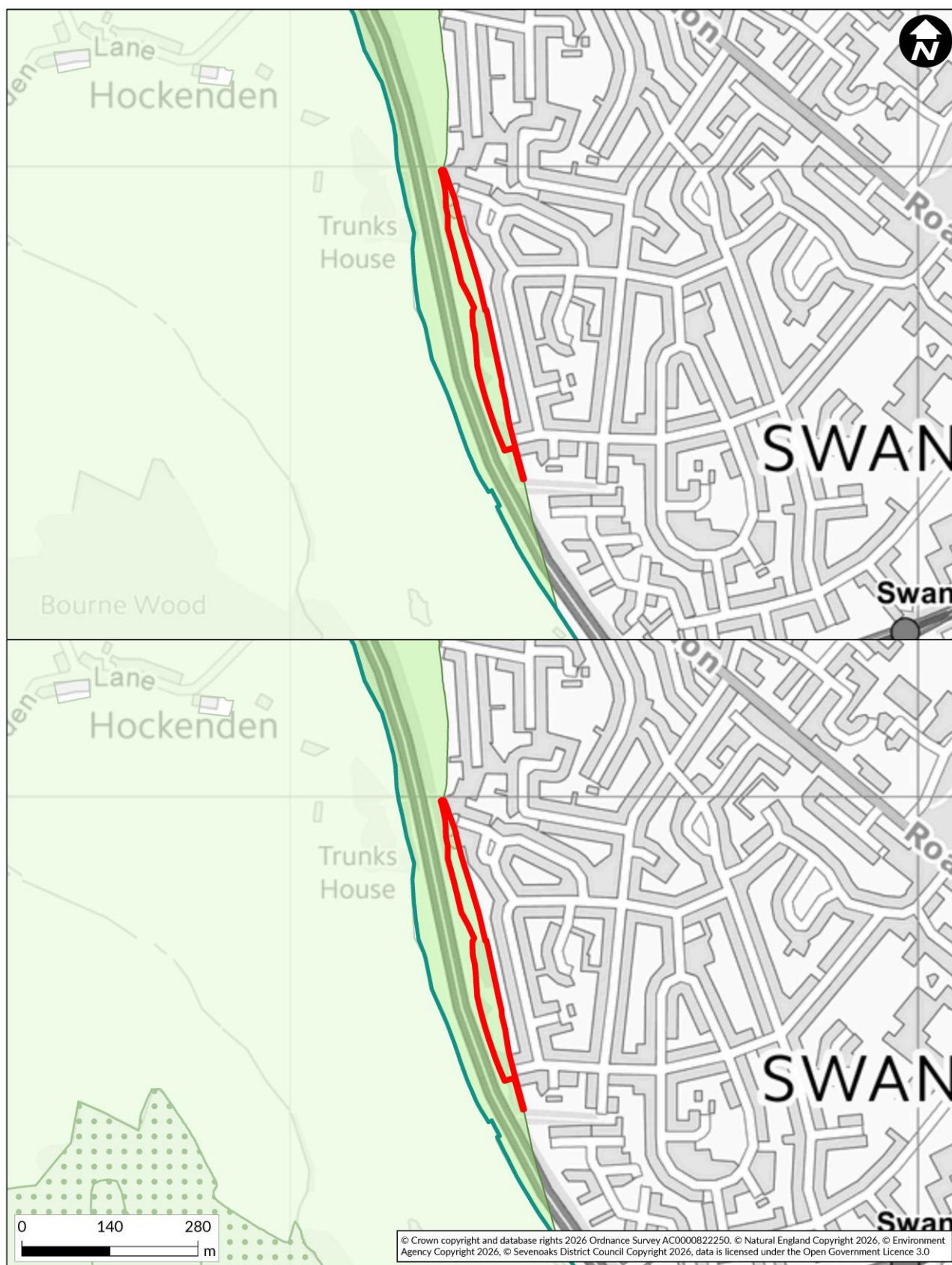
Suitable?	This is a partially brownfield site to the north of Sevenoaks Urban Area, which is identified as the Principal Town in the Settlement Hierarchy 2025, although it is noted that the site is not directly adjacent to the urban confines boundary. It is considered that the site is within a sustainable location, close to key services and facilities and within 2km of a train station in Dunton Green. This site has been assessed due to being directly adjacent to larger strategic site (HO/25/00012) which has been found suitable through this SHELAA. The site is fully within the Green Belt but is considered to constitute grey belt land under national policy due to being partially PDL and its performance against Green Belt purposes A, B and D. The site does not lie within national landscapes but is Grade 3 Agricultural Land Quality which would require further consideration. Rye Cottage
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	listed building also sits within the site and is considered to be unsuitable to be redeveloped. A noise assessment would be required for this site due to the proximity to the M26. There are no other constraints which would make this site unsuitable. However, due to the inclusion of a listed building at Rye Cottage, the site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to the inclusion of a listed building, Rye Cottage, within the site boundary.

HO/21/00206

Land and buildings on the east side of Swanley By Pass, Swanley, BR8 7JA



SITE DETAILS	
SHELAA Reference	HO/21/00206
Site Area (Ha)	1.06
Developable Area (Ha)	0.44
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO241
Site Description	This is a greenfield site partially within the urban confines of Swanley. The site comprises a narrow strip of land which was a former piggery, containing scrubland and partly demolished buildings. The site is bound to the west by the A20 and residential development to the east.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Partially within Swanley urban confines
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Partially within Swanley	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	Open Spaces 2018 206: Farm Avenue, Swanley Natural & Semi Natural 87.45%	
Green Belt	Partially within Green Belt 97.46%	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	97.46% Medium	
Agricultural Land Quality	Urban 100.0%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (former land use and made ground)	
Noise Pollution	Noise Assessment (A20)	
Air Quality	Air Quality Assessment- Impact of A20	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	100.0% within 400m of Swanley	
Town and Local Centres	Within 2km of Swanley - Town Centre (Walkable and cycle friendly)	
Train Station	Within 2km of Swanley Station (Walkable and cycle friendly)	

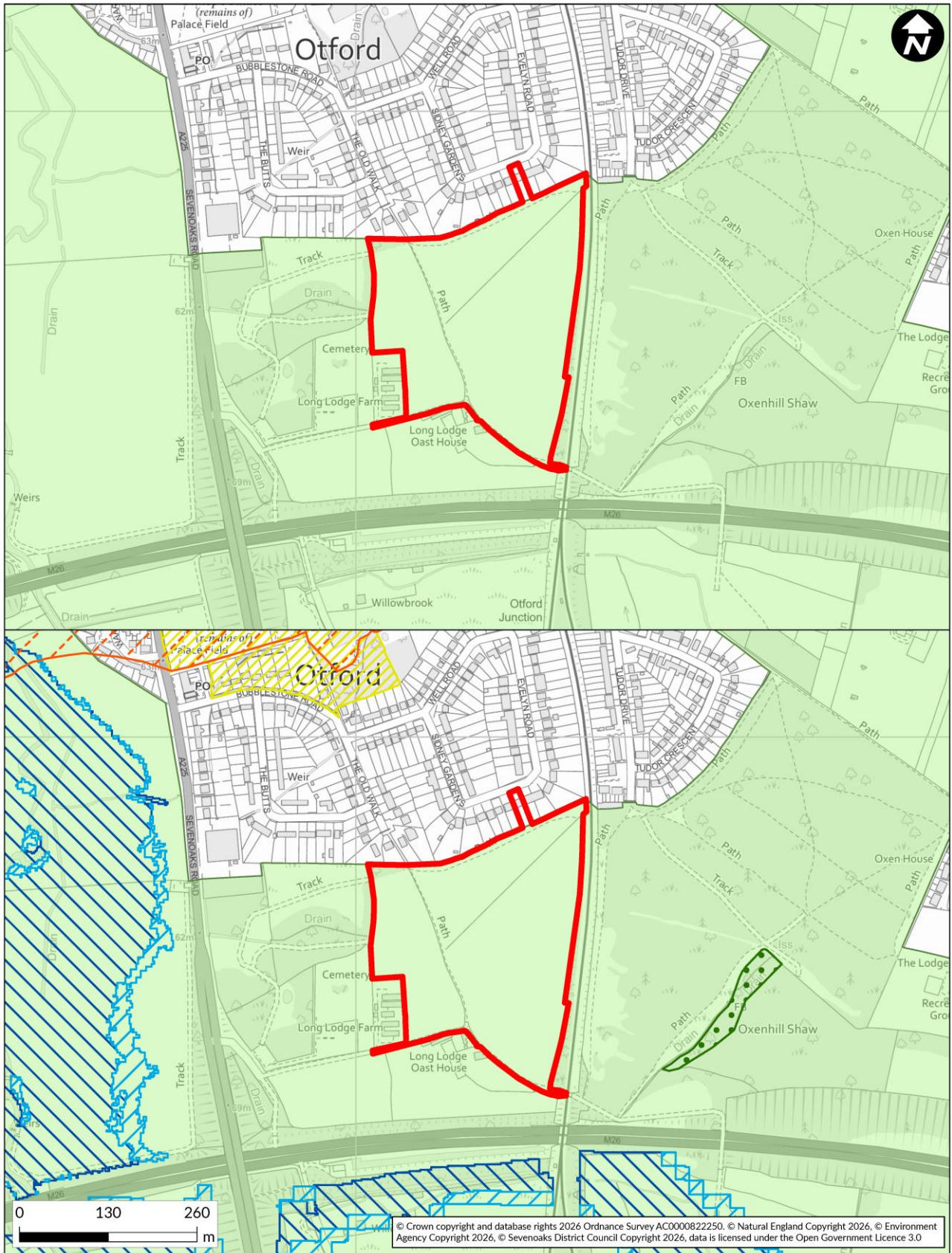
GREEN	AMBER	RED
15	9	2

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to and partially within the urban confines of Swanley, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, as well as Swanley Train Station. This site is within the Green Belt and is considered to be grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. However, the site lies within an area of designated open space (Farm Avenue, Swanley Natural & Semi Natural). Due to the sites proximity to the A20, Contaminated Land, Noise and Air Quality Assessments would be required. A new access would also be required. Due to the sites location within designated open space and likely environmental health issues, this site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is constrained by designated open space. Therefore, the site is not proposed for allocation.

HO/21/00222
Land South of Sidney Gardens, Otford TN14 5PP



SITE DETAILS	
SHELAA Reference	HO/21/00222
Site Area (Ha)	8.72
Developable Area (Ha)	8.72
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO160, HO360
Site Description	This is a greenfield site adjacent to the urban confines of Otford. The site comprises a parcel of land to the south of Otford, containing an agricultural field, used for grazing, and an access track. The site is bound by residential development to the north, railway line to the east, the M26 motorway to the south and open countryside to the west, including a farm and cemetery.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Otford
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to Otford)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Partially within Green Belt (but adjacent to Urban Confines of Otford)	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	99.07% Medium	
Agricultural Land Quality	Urban - 0.83%; Grade 3 - 93.89%; Grade 4 - 5.28%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	Noise Assessment (motorway and rail)	
Air Quality	Air Quality Assessment- Impact of M25	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	87.07% within 250m of Otford	
Town and Local Centres	Within 800m of Otford, Sevenoaks Road (walkable in 10 minutes)	
Train Station	Within 2km of Otford Station (walkable and cycle friendly)	

GREEN	AMBER	RED
15	10	1

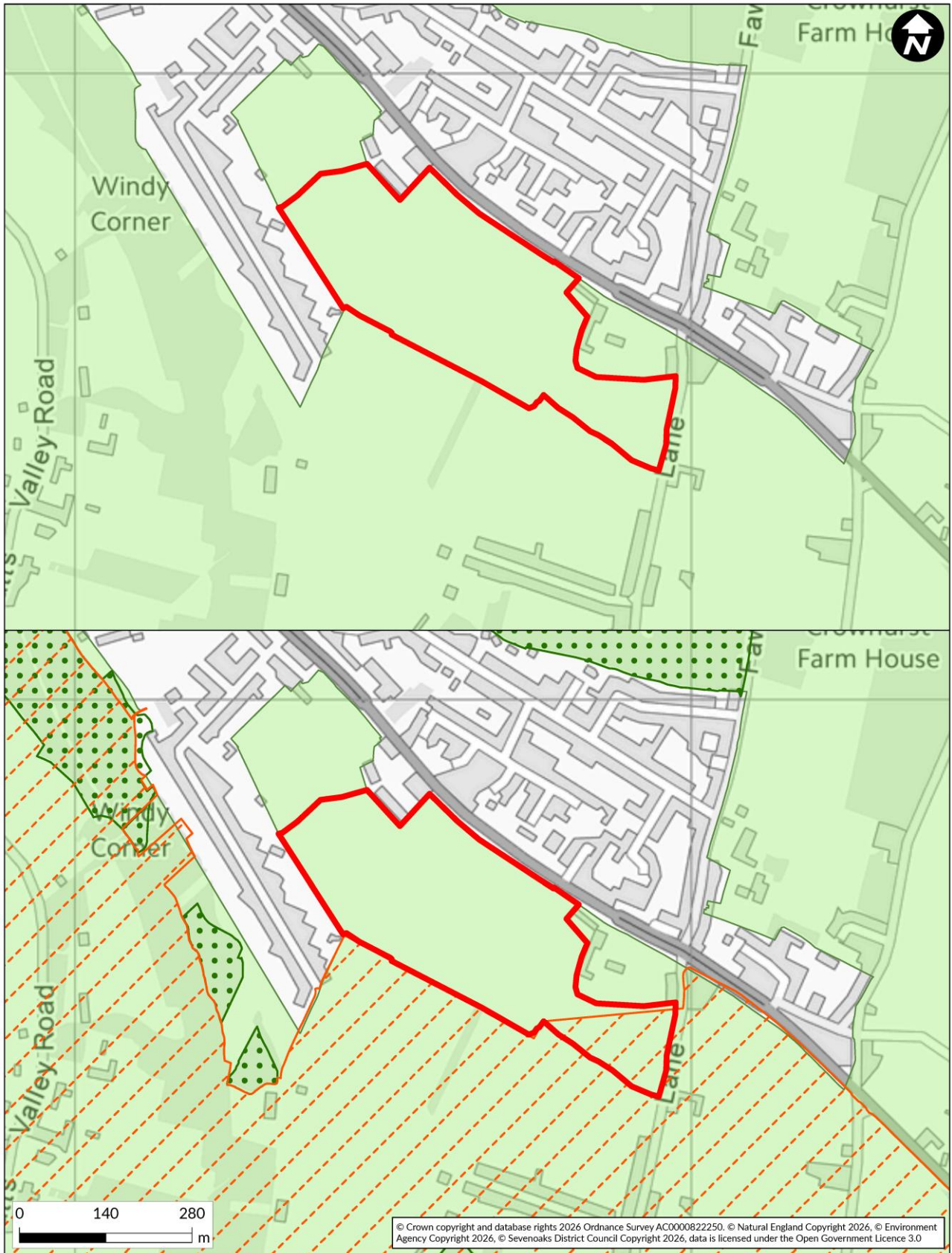
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Otford, which is identified as a Local Service Centre in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, including to Otford Train Station. The site lies within the Green Belt and is considered to be grey belt land under national policy. However, the site is considered to play a strong role in preventing the merging of Sevenoaks Urban Area and Otford. Accordingly, due to the constrained nature of the site, it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site plays a strong role in preventing the merging of Sevenoaks Urban Area and Otford and therefore is not considered suitable for development.

HO/21/00231
Land at London Road, West Kingsdown



SITE DETAILS	
SHELAA Reference	HO/21/00231
Site Area (Ha)	12.77
Developable Area (Ha)	12.77
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO9
Site Description	This is a greenfield site adjacent to the urban confines of West Kingsdown. This is a large parcel containing an agricultural field. The site is bound by London Road to the north, residential development to the west, School Lane to the east and open countryside to the south. The site slopes gently upwards from north to south. Mature trees line the northern boundary of the site.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of West Kingsdown
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to West Kingsdown	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to West Kingsdown	
Green Belt Stage 3	Grey belt	
National Landscapes	12.85% within Kent Downs National Landscapes	
Landscape Sensitivity	Low-medium – 99.76%	
Agricultural Land Quality	Grade 3 – 95.31%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 1 listed building	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional risk required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within 250m of West Kingsdown	
Town and Local Centres	Within 2km of West Kingsdown, Hever Road	
Train Station	Over 2km from a train station	

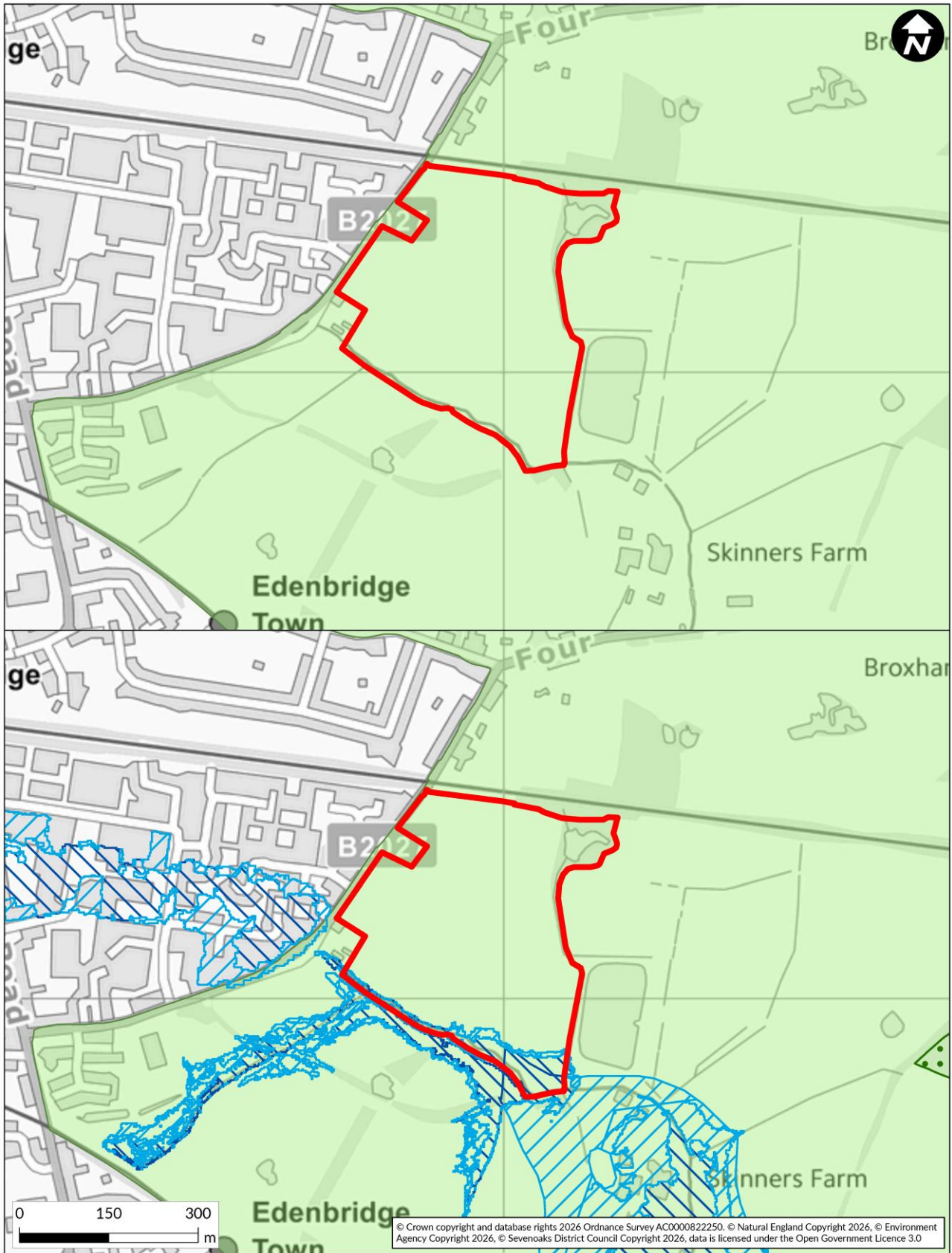
GREEN	AMBER	RED
18	7	2

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site situated adjacent to the urban confines of West Kingsdown. West Kingsdown is identified as a Service Village in the Settlement Hierarchy and therefore is considered to be in a sustainable location. The site is close to existing services and facilities in West Kingsdown, however does not benefit from access to a train station. The site lies fully within the Green Belt but is considered to constitute Grey Belt land under national policy due to its performance against Green Belt purpose A, B and D. A new access would be required, as well as a secondary access for emergency use. The site lies partially within Kent Downs National Landscapes and due to this, the wider site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 6-10.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do Not Include in Plan
SDC Comments	The wider parcel is not considered suitable for development due to partially being within the Kent Downs National Landscapes. SDC have reconsidered the site boundary of this submission and a smaller element is proposed for allocation.

HO/21/00233
Land north of Skinners Lane, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00233
Regulation 18 2025 Reference	EDEN9
Site Area (Ha)	14.39
Developable Area (Ha)	14.38
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	MX25, MX26 and HO190
Site Description	This is a greenfield site adjacent to the urban confines of Edenbridge. The site comprises a number of fields in agricultural use. Bound by Four Elms Road and residential units to the west, Skinners Lane to the south, the railway line to the north and open countryside to the east. Mature trees and hedges line the western and southern boundaries of the site. A public right of way runs through the site from the south at Skinners Lane to the northern boundary.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	5.64m from Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Edenbridge	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-high – 93.6%	
Agricultural Land Quality	Grade 3 – 91.05%	
Flood Risk	1.58% Flood Zone 2 6.63% Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of Heritage Assets	
Contamination Issues	Contaminated Land Assessment (former/adjacent use)	
Noise Pollution	Noise Assessment (railway)	
Air Quality	Odour assessment	
Mineral Safeguarding Area	218.97m2 0.15% within River Terrace Deposits	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 400m of Edenbridge	
Town and Local Centres	Within 2km of Edenbridge, Central Area, Edenbridge Northern Fringe and Edenbridge Southern Fringe	
Train Station	Within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
12.5	11.5	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site falls within the setting of the Kent Downs and High Weald National Landscapes and therefore refers to Natural England guidance on site allocations within National Landscapes. The response highlights specific advice in relation to Priority Habitats Inventory – Deciduous Woodland and Public Rights of Ways.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Edenbridge Town Council</u> A response from Edenbridge Town Council sets out support for this site only as part of a joined-up northern development with adjacent sites on Four Elms Road, subject to flood-risk mitigation, Green Belt boundaries and coordinated infrastructure. The response also makes comments on density, odour concerns, water supply and utilities capacity as well as detailed comments on infrastructure and strategic S106 requirements for the wider area. Edenbridge Town Council requests that, should the site proceed, a reduced development area be secured, with the rear of the site secured as accessible green space, and potential delivery on site of a community woodland or similar open space.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent objects to this site, citing landscape sensitivity, strongly performing Green Belt and grey belt status as key considerations.
General Response	Site EDEN9 would add traffic to highways already at capacity, worsen bottlenecks at a single-lane railway bridge, narrow rural roads and busy junctions, and rely on limited bus and rail services. Development could remove Green Belt farmland, hedgerows and woodland, harm floodplain functions and fragment wildlife habitats. Parts of the site lie in high-risk flood

	zones with no defined sustainable drainage layout, risking increased run-off and pollution. Local schools, health services and policing are near capacity. Public transport remains infrequent and inaccessible. Rights of way and open space may be reduced without clear buffers. Infrastructure plans lack phased triggers, funding commitments and detailed utility, sewerage and odour management strategies, while consultation methods and technical assessments appear incomplete.
Key issues raised	Highway access and local road capacity Green belt, landscape sensitivity and biodiversity Flood risk and sustainable drainage Social infrastructure and community services capacity Public transport and rail capacity Public rights of way and recreational amenity Deliverability, obligations and plan certainty Wastewater infrastructure and odour management

SITE PROMOTER RESPONSE

Pro Vision on behalf of Cooper Estates Strategic Land Ltd

A response from Pro Vision on behalf of Cooper Estates Strategic Land Ltd confirms support for this site allocation and sets out the site promoters commitment to developing the site within the plan period, reconfirming that the site is suitable and deliverable. The response also highlights the importance of the Development Briefs for each site being informed by up-to-date information and that it is deliverable.

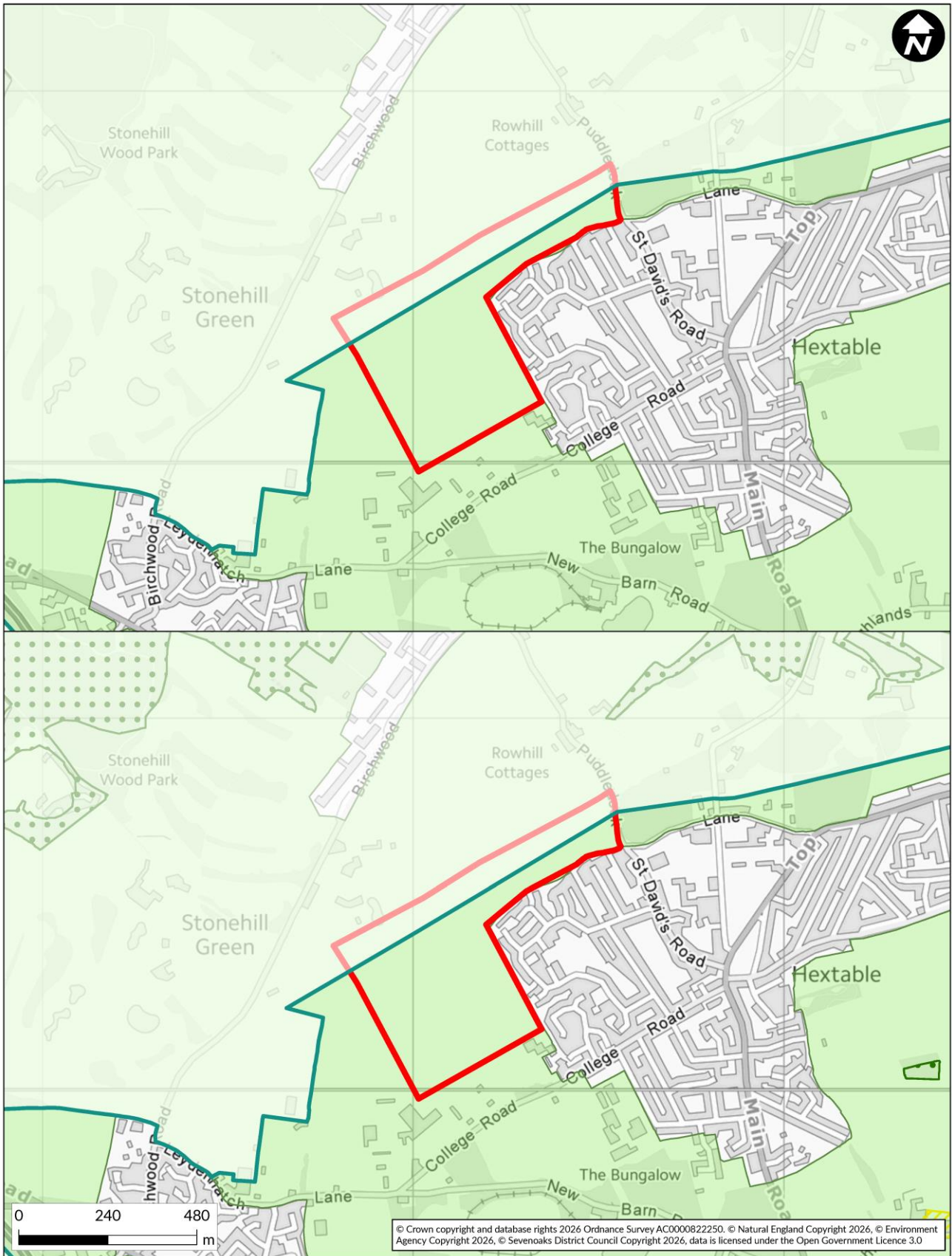
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site situated adjacent to the urban confines of Edenbridge. Edenbridge is identified as a town in the Settlement Hierarchy and is therefore considered to be in a sustainable location, close to existing key services and facilities, including access to two train stations. The site lies fully within the Green Belt but is considered to constitute grey belt land under national policy due to its performance against Green Belt purposes A, B and D. The site does not have direct access and so a new access would be required, as well as a secondary access for emergency use. Limited capacity on the surrounding transport network will also need consideration. The site has majority Medium-High Landscape Sensitivity. There are concerns regarding the proximity of the site to the sewage treatment works (east of the
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	site) and odour concerns. Due to this, the wider site boundary is considered unsuitable for development and a revised site boundary has been considered for allocation under HO/21/00233/B.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	Due to odour concerns and the sites proximity to the sewage treatment works east of the site, this wider site boundary is not considered suitable for allocation.

HO/21/00253
Stanhill Farm, north west of Hextable, Puddledock Lane



SITE DETAILS	
SHELAA Reference	HO/21/00253
Regulation 18 2025 Reference	HEX10
Site Area (Ha)	23.82
Developable Area (Ha)	23.82
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site adjacent to the urban confines of Hextable, partly within Dartford Borough. The site currently comprises a large area of agricultural land. The site is bound by open countryside to the north and west residential to the east and south, Puddledock Lane to the east. The site does not currently benefit from existing access.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hextable	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Hextable	
Green Belt Stage 3	Not grey belt (Strongly performing against Purpose B)	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 2 (71.2%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings Within 100m of Hextable Gardens	
Contamination Issues	Contaminated land assessment – former land use	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New access required	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Adjacent Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
16	6	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	No responses were received from Statutory Consultees.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hextable Parish Council</u> A response from Hextable Parish Council objects to the proposed site allocation, citing concerns with the loss of productive farmland and Green Belt land, the erosion of the buffer between Swanley and Hextable and the risk of urban sprawl. The response sets out that the proposed new homes would place undue pressure on roads, public transport, schools and healthcare services, resulting in congestion and overdevelopment. It also raises concerns about impacts on biodiversity, public rights of way, the setting of Hextable Heritage Gardens and the village's historic character and suggests that the proposed site conflicts with planning policies and lacks exceptional circumstances required for development in this location.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights key concerns regarding strongly performing Green Belt and the potential merging of Swanley and Hextable, Grade 2 agricultural land and food security, heritage impacts, access concerns and the cumulative impact of development on infrastructure.
General Response	Respondents raise serious concerns over highway access and traffic capacity. Narrow single-track rural lanes and congested motorway junctions cannot absorb an extra 500 daily vehicle movements without major upgrades. Local primary schools, GP surgeries, and secondary schools are at capacity with no expansion proposals. Conversion of Grade 2 agricultural land would eliminate local food production and community facilities. Loss of hedgerows, trees, and footpaths threatens biodiversity and ecological networks. No evidence supports upgrades to utilities, drainage, or public transport which risks service disruptions and increased flood incidents. Development within the green belt would erode settlement separation and rural buffers and harm heritage assets and public rights of way. The

	reclassification to “grey belt” and the consultation process lack clear justification.
Key issues raised	Highways access and traffic capacity Education and healthcare capacity Agricultural land and food production Biodiversity, habitats and ecological networks Utilities and wider infrastructure resilience Green Belt function and settlement separation Landscape, heritage assets and public rights of way Flood risk and surface water management

SITE PROMOTER RESPONSE

RE Planning on behalf of Sigma Strategic Land Ltd

A response from RE Planning on behalf of Sigma Strategic Land Ltd, as site promoter, is generally supportive of the proposed Development Strategy included in the Regulation 18 Local Plan and is fully supportive of the proposed site allocation. The response reconfirms availability of the site within the Plan period as well as providing further site specific detail and further comment on the wider Local Plan.

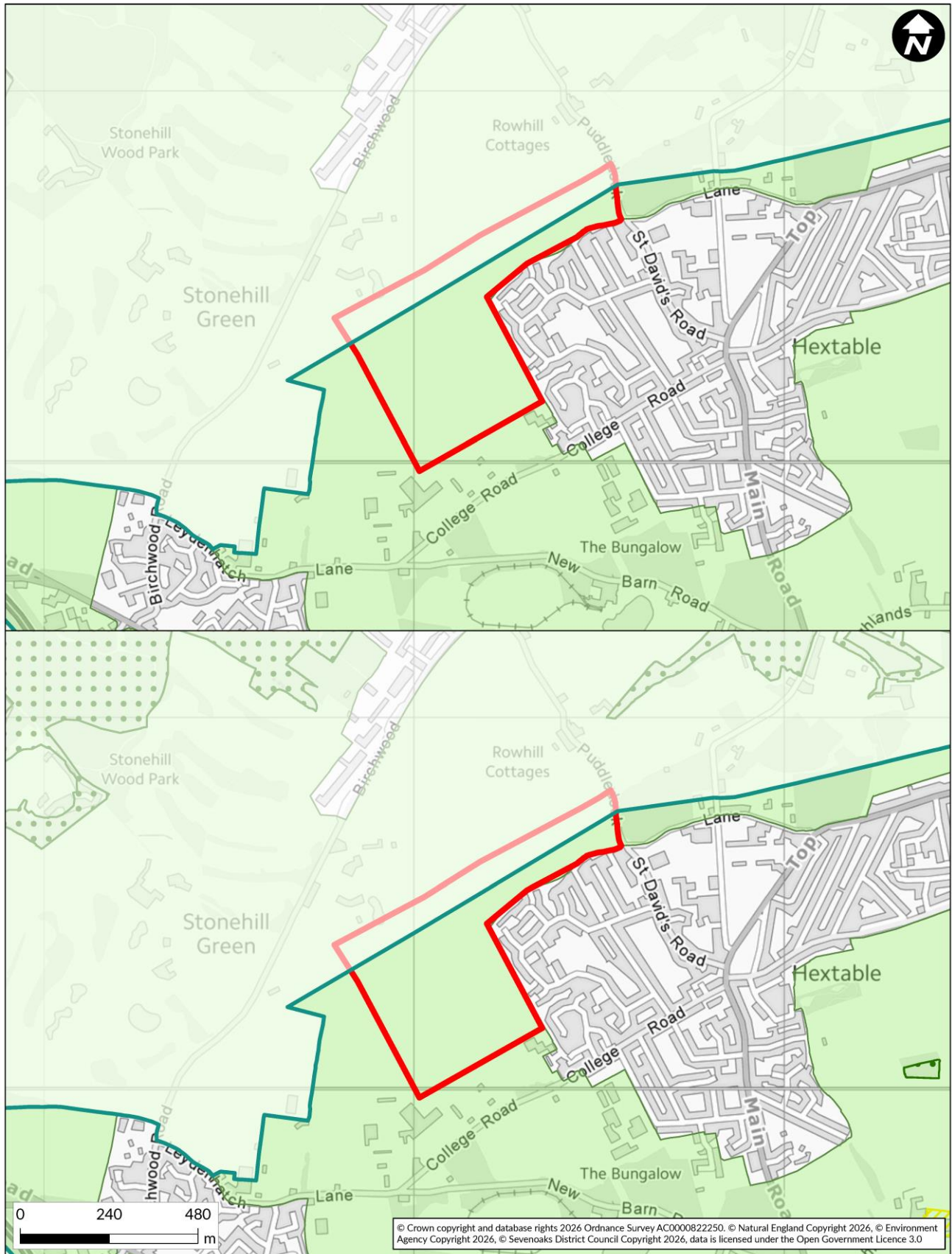
SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Hextable, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities in Hextable, although it is noted that the site lies over 2km from both an allocated local centre and a train station. The site lies fully within the Green Belt and is not considered to constitute grey belt land under national policy, due to performing strongly against Green Belt purpose B (preventing the merging of Swanley and Hextable). The site does not lie within national landscapes, but is Grade 2 agricultural land quality which would need further consideration. The site would also require a new access option and consideration to be given to the adjacent Hextable Gardens and nearby listed buildings. A contaminated land assessment would also be required. Due to being strongly performing Green Belt, the wider site is not considered suitable for development. The
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	reduced site boundary brings the site in line with the also Suitable SHELAA site to the south, and reduces the extent of the site which lies within the strategic gap between Swanley and Hextable. However, since the Regulation 18 consultation it is now considered that this reduced site boundary would unacceptably merge the settlements of Swanley and Hextable, against Green Belt Purpose B. There are also concerns that part of the site lies outside of the Sevenoaks District boundary. Accordingly, the site is considered unsuitable.
Availability	The site has been submitted by the landowner and is considered to be available in years 6-10
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to the potential merging of Swanley and Hextable, contrary to Green Belt Purpose B, as well as cross-boundary concerns.

HO/21/00253
Stanhill Farm, north west of Hextable, Puddledock Lane



SITE DETAILS	
SHELAA Reference	HO/21/00253
Site Area (Ha)	23.82
Developable Area (Ha)	23.82
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site adjacent to the urban confines of Hextable, partly within Dartford Borough. The site currently comprises a large area of agricultural land. The site is bound by open countryside to the north and west residential to the east and south, Puddledock Lane to the east. The site does not currently benefit from existing access.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hextable	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Hextable	
Green Belt Stage 3	Not grey belt (Strongly performing against Purpose B)	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 2 (71.2%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings Within 100m of Hextable Gardens	
Contamination Issues	Contaminated land assessment – former land use	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New access required	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Adjacent Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from train station	

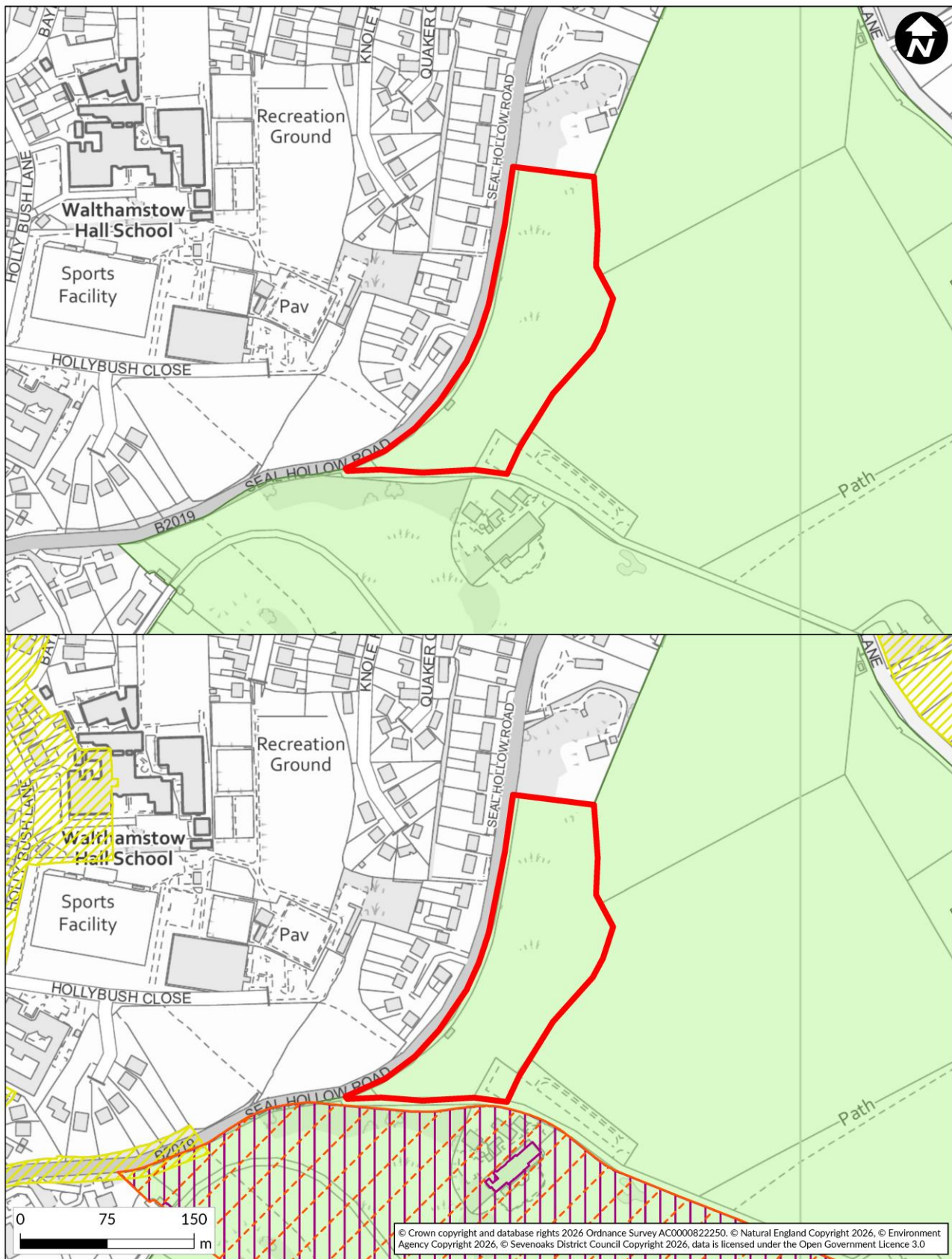
GREEN	AMBER	RED
17	6	4

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Hextable, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities in Hextable, although it is noted that the site lies over 2km from both an allocated local centre and a train station. The site lies fully within the Green Belt and is not considered to constitute grey belt land under national policy, due to performing strongly against Green Belt purpose B (preventing the merging of Swanley and Hextable). The site does not lie within national landscapes, but is Grade 2 agricultural land quality which would need further consideration. The site would also require a new access option and consideration to be given to the adjacent Hextable Gardens and nearby listed buildings. A contaminated land assessment would also be required. Due to being strongly performing Green Belt, the wider site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The wider parcel is not considered suitable for development due to performing strongly against Green Belt purpose B (preventing the merging of Swanley and Hextable) and is therefore not considered to be grey belt land.

HO/21/00254
Land adjacent Seal Hollow Road and north of Blackhall Lane, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/21/00254
Site Area (Ha)	2.47
Developable Area (Ha)	2.47
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO101
Site Description	This is a greenfield site situated adjacent to the urban confines of Sevenoaks Urban Area, currently comprising grazing land. The site is bound by Seal Hollow Road to the west, residential to the north, a practice range and a car park to the west and the entry road to Knole Park Golf Club to the south.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	16 residential units
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Sevenoaks Urban Area	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the green belt adjacent to Sevenoaks	
Green Belt Stage 3	Grey belt	
National Landscapes	Within 100m buffer of Kent Downs National Landscapes	
Landscape Sensitivity	Medium-high – 89.42%	
Agricultural Land Quality	Grade 3 – 41.14%	
Flood Risk	Flood zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Sevenoaks - The Vine Conservation Area Within 200m of 3 listed buildings Within 200m of KNOLE registered park / garden Within 100m of 2 locally listed assets	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	Noise Assessment (highway)	
Air Quality	Air Quality Assessment (impact on local AQMA)	
Mineral Safeguarding Area	Within Limestone - Hythe Formation - Kentish Ragstone	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	Within 400m of Sevenoaks	
Town and Local Centres	Within 800m of Sevenoaks – Town Centre. Within 2km of Sevenoaks – Town Centre, St Johns, Tubs Hill and Sevenoaks Station	

Train Station	Within 2km of Bat and Ball and Sevenoaks	
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GREEN	AMBER	RED
11	10	5

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site situated adjacent to the urban confines of Sevenoaks Urban Area, which is identified as the District's principal town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to key services and facilities, including Sevenoaks Train Station. The site lies fully within the Green Belt, however is considered to constitute Grey Belt land in line with national policy. However, the access to the site is not adopted by the highways authority and therefore access and capacity are considered to be difficult and limited. The site is mostly within Medium-high landscape sensitivity. There are no other constraints which would make the site unsuitable. Due to access and capacity issues, the site is considered to be unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable for development due to access and capacity issues.

HO/21/00264
Land west of allotments, Bradbourne Vale Road, Sevenoaks, TN13 3QQ



SITE DETAILS	
SHELAA Reference	HO/21/00264
Regulation 18 2025 Reference	SEV22
Site Area (Ha)	2.48
Developable Area (Ha)	2.46
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO203
Site Description	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area. The site comprises a parcel of land to the north of Bradbourne Vale Road, forming part of an agricultural field used for grazing. The site is bound by Bradbourne Vale Road and residential development to the south, allotments to the east, residential development and woodland to the west and Sevenoaks Wildfowl Reserve to the north.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to Sevenoaks)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within (but adjacent to Urban Confines of Sevenoaks)	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Low - Medium	
Agricultural Land Quality	Urban - 15.45%; Grade 4 - 84.55%	
Flood Risk	27.68% in Flood Zone 2 and 22.85% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Adjacent to Sevenoaks Gravel Pits	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	22.4% within 100m of Bradbourne Lakes Park Kent Compendium historic park / garden; Within 100m of 4 locally listed assets	
Contamination Issues	Contaminated Land Assessment (former/adjacent use)	
Noise Pollution	Noise Assessment (highway)	
Air Quality	Air Quality Assessment (impact on local AQMA)	
Mineral Safeguarding Area	Within Mineral Safeguarding Area	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	100.0% within 400m of Sevenoaks	
Town and Local Centres	Within 800m of Riverhead (walkable in 10 minutes)	

Train Station	Within 2km of Bat and Ball; within 2km of Dunton Green; within 2km of Sevenoaks (walkable and cycle friendly)	
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GREEN	AMBER	RED
13	11	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site lies immediately adjacent to Sevenoaks Gravel Pits SSSI and as such any potential adverse impacts on the SSSI as a result of development will be required as part of a planning application. The response also notes that Sevenoaks Gravel Pits SSSI is designated for its assemblages of breeding birds and associated lowland open waters habitat.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Sevenoaks Town Council</u> A response from Sevenoaks Town Council strongly objects to the proposed site, citing concerns over the loss of the riding facility, which is considered a valued community asset and should be protected by emerging Policy COM1 and Policy L8 of the adopted Sevenoaks Town Neighbourhood Plan. The response emphasises that the site is designated for community use, has been registered as an Asset of Community Value and could provide a future extension to the adjacent allotments should the current use cease, particularly given the anticipated population growth of the surrounding proposed developments in Northern Sevenoaks. The response sets out that development would only be justified if the existing facility is no longer needed or can be replaced nearby without disruption to services and that any future use must protect the adjacent nature reserve from increased informal access. The response also stresses the need to assess cumulative impacts alongside other developments in the area and to ensure developers engage with the Town Neighbourhood Plan and Highway Improvement Plan when shaping infrastructure contributions and S106 agreements.

	In particular, the Town Council recommends that the development brief secure contributions towards improved walking and cycling links, a new entrance and supporting facilities for Sevenoaks Wildlife Reserve and additional allotment provision to meet both existing and future demand.
Other Consultation Bodies	<u>Kent Wildlife Trust</u> A response from Kent Wildlife Trust considers the site unsuitable for development due to major constraints, including its location within Flood Zone 3 and strong Green Belt role, alongside significant ecological impacts on the Sevenoaks Wildlife Reserve and River Darent. Development would fragment habitats, reduce ecological connectivity, harm species through loss of foraging and nesting areas, and increase pollution and recreational pressure, particularly affecting the sensitive chalk stream. Overall, the response raises environmental and policy concerns that would require extensive mitigation if development were pursued.
General Response	Respondents highlight that development on this site would increase human activity, noise, lighting and runoff, harming protected species and potentially degrading the Sevenoaks Wildfowl Reserve SSSI buffer. They note that the loss of greenfield farmland would erode visual amenity and the semi-rural town edge. Building on flood zones 2 and 3 may heighten fluvial and surface-water flood risk and affect the River Darent chalk stream. Local roads (Bradbourne Vale Road, A25, Otford Road) are seen as being at or over capacity, public transport as unreliable and cycling routes as unsafe, which could raise car use and emissions in an AQMA. Statutory designations (heritage sensitivity, mineral safeguarding and noise exposure) are viewed as further constraints that may reduce housing yield. Existing recreational uses (equestrian centre, allotments and walking links) are valued, and respondents suggest that open space retention or enhancement would better support community and environmental wellbeing.
Key issues raised	Ecological impacts and SSSI adjacency Land status, landscape and townscape character Flood risk and hydrology Transport, access and local highways capacity Air quality and emissions (AQMA) Statutory and technical constraints (heritage, noise, minerals) Community facilities and recreational use Developability and housing yield

SITE PROMOTER RESPONSE

Sevenoaks District Council

A response from Sevenoaks District Council Property Team, as landowner, confirms that the site is currently being leased to a third party and, whilst the Council recognises the development potential of the site and concurs with the findings of the SHELAA 2025, it has no intention of developing this site in the foreseeable future. Further investigation and feasibility studies would need to be undertaken. However, the site does consider this site to be of strategic importance and welcomes its inclusion in the Local Plan.

SHELAA 2026 CONCLUSIONS

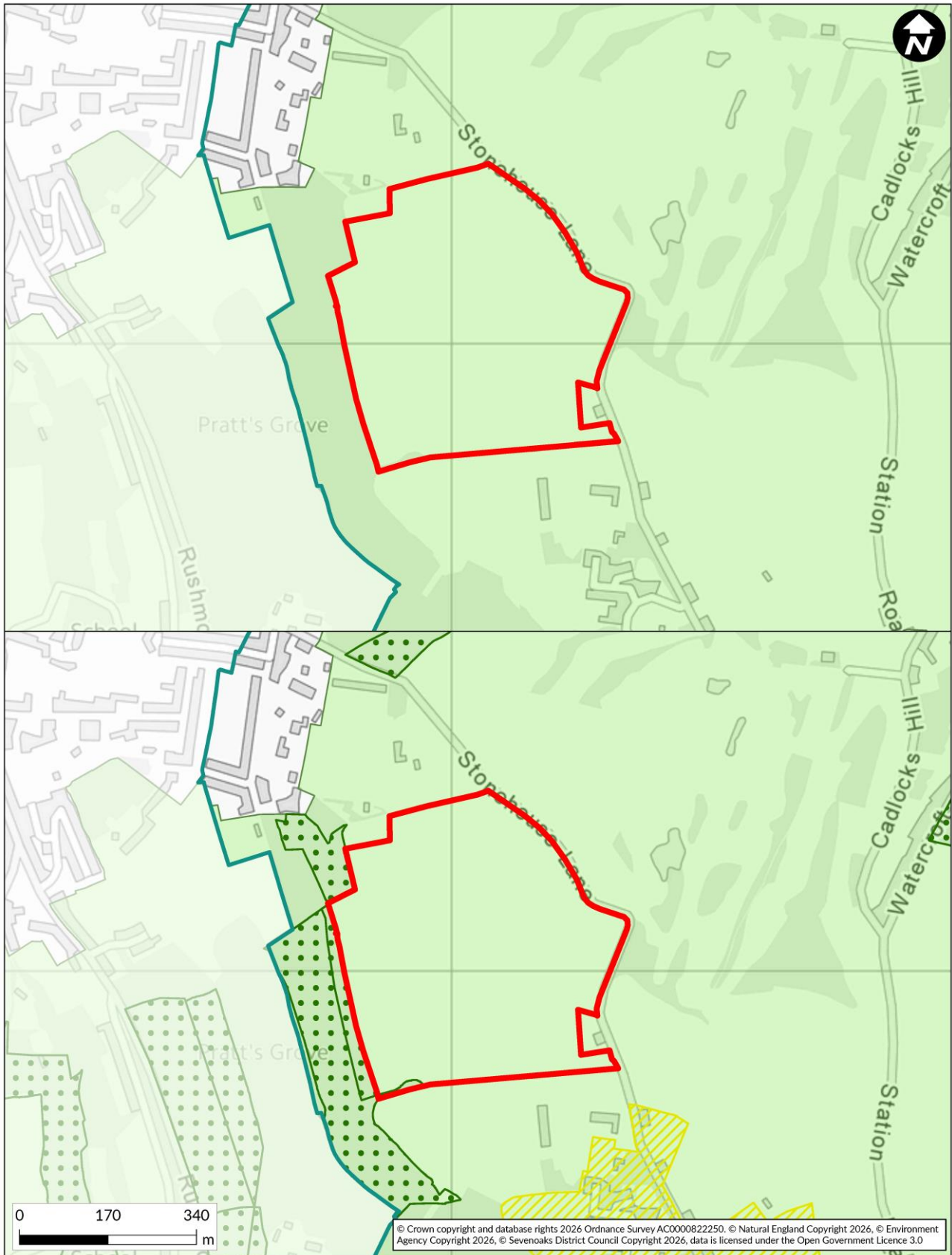
Suitability

This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area, which is identified as the District's principal town in the Settlement Hierarchy 2025. The site is therefore considered to be in a highly sustainable location, close to existing key services and facilities, including benefiting from access to three train stations, Bat and Ball, Dunton Green and Sevenoaks, within walking and cycling distance. The site lies fully within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site does not lie within National Landscapes. The site is partially within Flood Zones 2 and 3 and therefore any proposals for this site would need to take this into account. The site lies within Mineral Safeguarding Area. Contaminated land, noise and air quality assessments would be required for a proposal coming forwards on this site, and the site lies within a SSSI impact zone which would require further consultation. There is considered to be capacity on the surrounding road network for a proposal of this scale, but a new site access would be required. Notwithstanding the above, there are not considered to be any constraints to this site which would make it unsuitable at this stage. It is noted that the site is currently used as a riding centre and is considered a community facility, however this is not a formal allocation and is not capable in itself of rendering a site unsuitable. Therefore, due to the sustainable location of this site, its status as grey belt and its relatively unconstrained nature, the site is considered to be suitable for residential development.

Availability	The landowner has confirmed that there is currently no intention to develop this site in the foreseeable future. The site is therefore unavailable.
Achievability	No constraints that could render the site financially unviable at this time. However, the submission identifies that no title report has been prepared.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	There are no current plans by the landowner to develop this site within the Plan period and the site is unavailable. The site is therefore unsuitable for allocation.

HO/21/00265
Land west of Stonehouse Lane, Halstead, TN14 7HH



SITE DETAILS	
SHELAA Reference	HO/21/00265
Site Area (Ha)	23.73
Developable Area (Ha)	23.63
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site near the urban confines of Pratts Bottom. The site comprises a large parcel of open land. The site is bound to the north and east by Stonehouse Lane, woodland to the west and open countryside to the south.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of urban confines of Pratts Bottom
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (adjacent to Pratts Bottom)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Completely within the Green Belt	
Green Belt Stage 3	Not considered to be grey belt	
National Landscape	Not within National Landscape	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban - 2.63%; Other - 2.99%; Grade 3 - 94.38%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	0.01% within Woods and Pasture at Pratt's Bottom	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Partially within Ancient Woodland 0.41%	
Presence of Heritage Assets	4.58% within 200m of Halstead conservation area; Within 200m of 2 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	6.73% within 400m of Greater London Large Built-Up Area	
Town and Local Centres	Over 2km to Town and Local Centre	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
14	5	7

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines boundary of Pratts Bottom, which is identified as a Secondary Service Centre in the Settlement Hierarchy 2025, and it is therefore considered that the site is close to key services and facilities. Although it is noted that the site lies over 2km from a railway station, Knockholt Station lies just over 2km from the site. The site lies fully within the Green Belt and is not considered to be grey belt land under national policy, due to performing strongly against Green Belt purpose A, preventing the urban sprawl of a large built up area (Greater London) The site does not lie within national landscapes and there are no other land constraints which would make the site unsuitable. The site does lie within close proximity to Halstead Conservation Area and 2 listed buildings, which would need further consideration. Site access and network capacity issues have been identified and these should be further considered as part of the wider site. Due to being strongly performing Green Belt, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is not considered to be suitable due to being strongly performing Green Belt.

HO/21/00275/B
Former Oasis Academy, 37 Egerton Avenue, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00275
Regulation 18 2025 Reference	HEX1
Site Area (Ha)	15.41
Developable Area (Ha)	15.41
Brownfield / Greenfield	Partially brownfield
Planning History	None
Previous SHELAA Ref (2018)	HO225
Site Description	This is a partially brownfield site adjacent to the urban confines of Hextable and near Swanley. The site comprises the former Oasis Academy Secondary School, including school buildings, car parking, playing fields and scrubland. The site is bound by residential development to the east, New Barn Road to the south and College Road to the north.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within the buffer of urban confines of Swanley/Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to Hextable)	
Land Use (GF/PDL)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	Yes (Open Spaces 2018 275: Hextable Green Corridor, College Road, Hextable Green Corridor - Intersect Area = 15091.99m ² 9.8%)	
Green Belt	Within Green Belt (but adjacent to Urban Confines of Hextable)	
Green Belt Stage 3	Not grey belt	
National Landscape	Not within National Landscape	
Landscape Sensitivity	100.0% Low - Medium	
Agricultural Land Quality	Urban - 8.72%; Grade 2 - 91.28%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings; 10.01% within Hextable Gardens Kent Compendium historic park / garden	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	Air Quality Assessment (impact on local AQMA)	
Mineral Safeguarding Area	None	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	65.61% within 400m of Swanley	
Town and Local Centres	Within 800m of Hextable, Upper Main Road (walkable in 10 minutes)	

Train Station	Over 2km to nearest train station	
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GREEN	AMBER	RED
15	7	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	No responses were received from Statutory Consultees.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hextable Parish Council</u> A response from Hextable Parish Council neither agrees nor disagrees with the site proposal. The response highlights that it is sensible to redevelop the abandoned site, however The Howard Venue and car park should be protected. The response also notes the importance of the Avenue of Limes, infrastructure requirements, including roads and transport and health services, as well as providing comment on the emerging density Policy H7 in relation to this site.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns regarding the loss of the school site, loss of car parking space for the Howard Venue and the impact on nearby street parking, as well as the cumulative impact on surrounding infrastructure.
General Response	Respondents emphasise the need to retain or increase on-site car parking at the Howard venue and new homes to avoid vehicle spill-over onto narrow residential lanes, given limited public transport and the need for accessible spaces. They report that local roads already exceed capacity and fear extra traffic from Site HEX1 could worsen congestion, safety and road wear. They point to a lack of secondary and sixth-form places without a plan to safeguard land for education, and to overstretched GP services, utilities and surface-water drainage that could struggle with more demand. Respondents also warn that housing would harm biodiversity, heritage assets and productive farmland without ecological, landscape and heritage surveys, and that minimal bus services would hamper sustainable travel. They call

	for detailed transport, environmental and infrastructure assessments and suggest considering alternative sites or mixed-use reuse of existing buildings to protect community facilities.
Key issues raised	Car parking provision Howard Venue operations Highway capacity and access Education capacity and site safeguarding Utilities and local services capacity Biodiversity, landscape, heritage and agricultural land Public transport and modal shift Flood risk and surface water drainage

SITE PROMOTER RESPONSE

DHA Planning on behalf of Kent County Council

A response from DHA Planning on behalf of Kent County Council, as the site promoter, confirms support for the proposed allocation in the Regulation 18 consultation and confirms support and availability for its continued inclusion in the Local Plan process. The response includes further comment in regard to the wider site proposal (which spans further west towards Swanley) as well as detailed commentary on the Regulation 18 Local Plan version and emerging Development Strategy and policies.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a partial brownfield site adjacent to the urban confines of Hextable which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025, and within the buffer of the urban confines of Swanley, which is identified as a town. The site is therefore considered to be in a sustainable location, close to existing key services and facilities in Hextable and Swanley, although it is noted that the site lies over 2km from a railway station. The site lies fully within the Green Belt and is not considered to be grey belt due to the role the wider site plays in preventing the merging of Swanley and Hextable (Green Belt purpose B). Therefore, the wider site is not considered to be suitable for development. The reduced site boundary follows the element of the site submission which lies outside of the Kent Downs National Landscape. The school is considered by KCC to be surplus to requirements but the existing dance facility should be retained.
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Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This iteration of the site includes The Howard Venue and associated car parking, where the loss of these elements of the site is not supported. Accordingly, the site boundary has been redefined under HO/26/00002 and this element of the site is found unsuitable.

HO/21/00275
Former Oasis Academy, 37 Egerton Avenue, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00275
Site Area (Ha)	15.41
Developable Area (Ha)	15.41
Brownfield / Greenfield	Partially brownfield
Planning History	None
Previous SHELAA Ref (2018)	HO225
Site Description	This is a partially brownfield site adjacent to the urban confines of Hextable and near Swanley. The site comprises the former Oasis Academy Secondary School, including school buildings, car parking, playing fields and scrubland. The site is bound by residential development to the east, New Barn Road to the south and College Road to the north.
Site Type	New Build
When will this development be delivered?	N/A
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within the buffer of urban confines of Swanley/Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to Hextable)	
Land Use (GF/PDL)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	Yes (Open Spaces 2018 275: Hextable Green Corridor, College Road, Hextable Green Corridor - Intersect Area = 15091.99m ² 9.8%)	
Green Belt	Within Green Belt (but adjacent to Urban Confines of Hextable)	
Green Belt Stage 3	Not grey belt	
National Landscape	Not within National Landscape	
Landscape Sensitivity	100.0% Low - Medium	
Agricultural Land Quality	Urban - 8.72%; Grade 2 - 91.28%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings; 10.01% within Hextable Gardens Kent Compendium historic park / garden	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	Air Quality Assessment (impact on local AQMA)	
Mineral Safeguarding Area	None	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	65.61% within 400m of Swanley	
Town and Local Centres	Within 800m of Hextable, Upper Main Road (walkable in 10 minutes)	

Train Station	Over 2km to nearest train station	
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GREEN	AMBER	RED
15	7	4

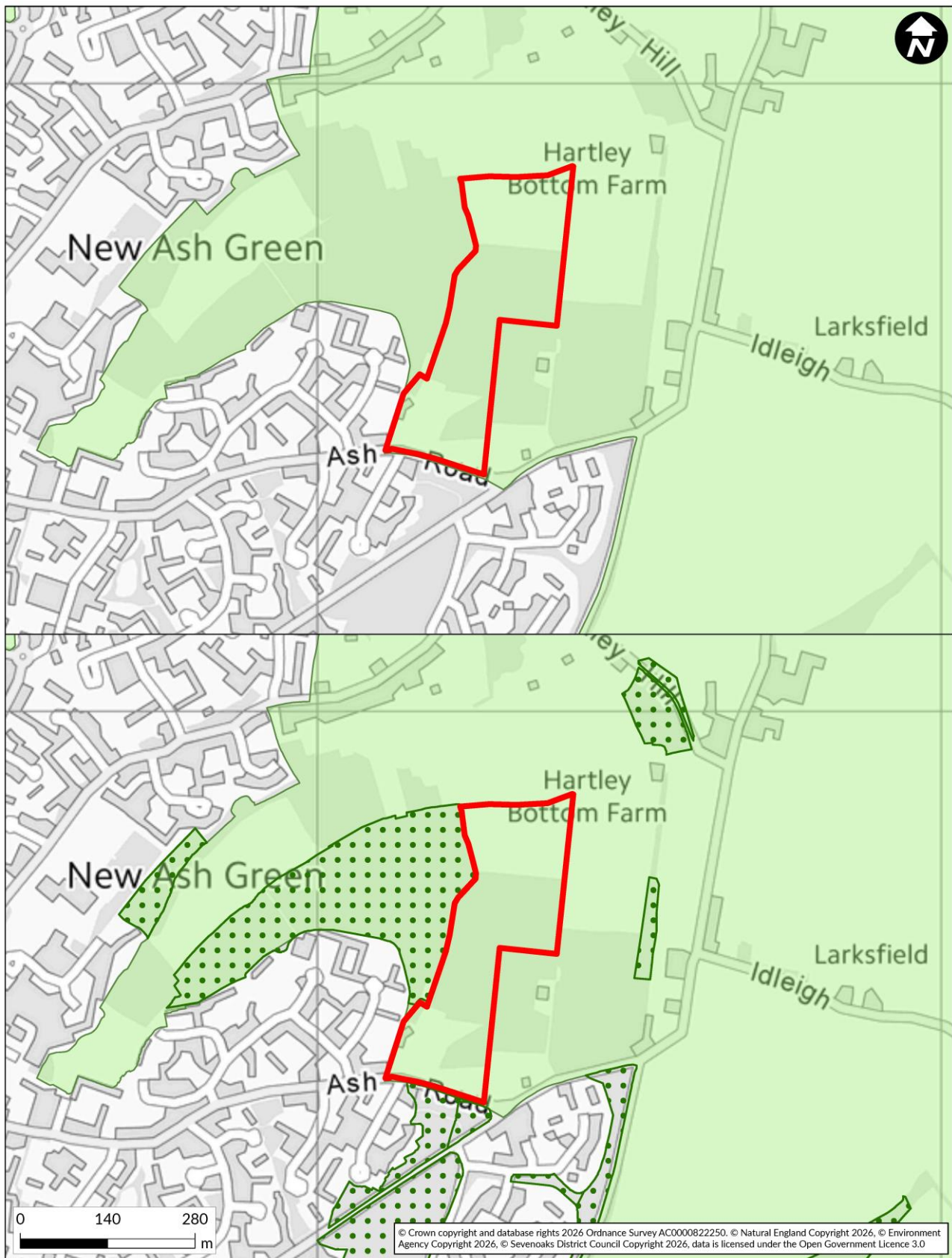
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a partial brownfield site adjacent to the urban confines of Hextable which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025, and within the buffer of the urban confines of Swanley, which is identified as a town. The site is therefore considered to be in a sustainable location, close to existing key services and facilities in Hextable and Swanley, although it is noted that the site lies over 2km from a railway station. The site lies fully within the Green Belt and is not considered to be grey belt due to the role the wider site plays in preventing the merging of Swanley and Hextable (Green Belt purpose B). Therefore, the wider site is not considered to be suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The wider site is greenfield and is not considered to constitute grey belt land, playing a vital role in preventing the merging of Swanley and Hextable. The site is therefore considered to be unsuitable for development.

HO/21/00280
Land at Slides Farm, North Ash Road, New Ash Green



SITE DETAILS	
SHELAA Reference	HO/21/00280
Regulation 18 2025 Reference	NAG7
Site Area (Ha)	6.7
Developable Area (Ha)	6.7
Brownfield / Greenfield	Partially brownfield
Planning History	None
Previous SHELAA Ref (2018)	HO320
Site Description	This is a greenfield site adjacent to the urban confines of New Ash Green. The site comprises a large parcel to the east of New Ash Green including a residential dwelling, associated garden and outbuildings, with the remainder of the site being used as an orchard, agricultural field and for grazing. The site is bound by North Ash Road to the south, residential development and woodland to the west and north and open countryside to the east.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of New Ash Green
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to New Ash Green)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt (but adjacent to Urban Confines of New Ash Green)	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Low - Medium	
Agricultural Land Quality	Urban - 0.34%; Grade 3 - 99.66%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	10.2% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	79.93% within 250m of New Ash Green	
Town and Local Centres	Within 800m of New Ash Green, Village Centre (walkable in 10 minutes)	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
17	7	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England sets out that the site consists almost wholly of Priority Habitat Inventory – Traditional Orchard and abuts Ancient and Semi-Natural Woodland. In addition the site also abuts a Public Right of Way.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Ash-cum-Ridley Parish Council</u> A response from Ash-cum-Ridley Parish Council objects to the proposed site allocation, citing concerns with the scale and density of development on this Green Belt site, suggesting that it fails to satisfy Green Belt and grey belt policy requirements and could weaken defensible Green Belt boundaries. The response highlights the ecological value of the former orchard, ancient woodland, hedgerows and priority habitats on and around the site, and calls for detailed ecological assessment before any allocation is progressed. Concerns are also raised regarding highway constraints, lack of footways, impacts on important groundwater resources and the potential harm to biodiversity and landscape character. The response suggests that a much smaller, carefully designed scheme may be acceptable in less constrained parts of the site but maintains that the allocation in its current form is not supported.
Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP highlights that this site forms a strong eastern boundary to New Ash Green. <u>The Woodland Trust</u> A response from The Woodland Trust highlights that Nine Horse Wood, an area of Ancient Semi-Natural Woodland is adjacent to the western boundary of the site and makes associated recommendations for the site proposal.
General Response	Respondents highlight that promised transport improvements have not materialised, with withdrawn services, reduced timetables and no safe pedestrian or cycle links. They report narrow rural roads are congested and accident-prone, forcing car

	dependence. A scheme of 150 homes is seen as disproportionate to the village's modest scale, risking overdevelopment, potentially harming listed buildings and eroding semi-rural character unless unit numbers are reduced and design reflects local principles. Concerns include threats to Green Belt purposes, landscape character and habitat loss from settlement sprawl and weakening of the boundary. Respondents warn of potential harm to ancient woodland and orchard habitats without adequate buffers and of added strain on already stretched healthcare and education facilities. They note uncertainties over flood risk, ageing utilities and loss of productive agricultural land and rural heritage. Calls are made for clearer land classifications, firm infrastructure commitments and alternative approaches to preserve local distinctiveness.
Key issues raised	Transport infrastructure and access Scale, density, design and integration with the village Green Belt, landscape character and settlement identity Healthcare and education capacity Public transport, parking and car dependency Ecology, ancient woodland and orchard habitat Utilities, drainage and flood risk Loss of agricultural land and rural heritage

SITE PROMOTER RESPONSE

DHA Planning on behalf of Richborough Estates

A response from DHA Planning on behalf of Richborough Estates, as site promoter, confirms support for the proposed site allocation and reaffirms site availability and deliverability within the Plan period. The response also provides further site specific detail with regard to the site proposals, including a Vision document. The response provides detailed wider commentary on emerging policies within the Local Plan as well as the proposed Development Strategy and evidence base.

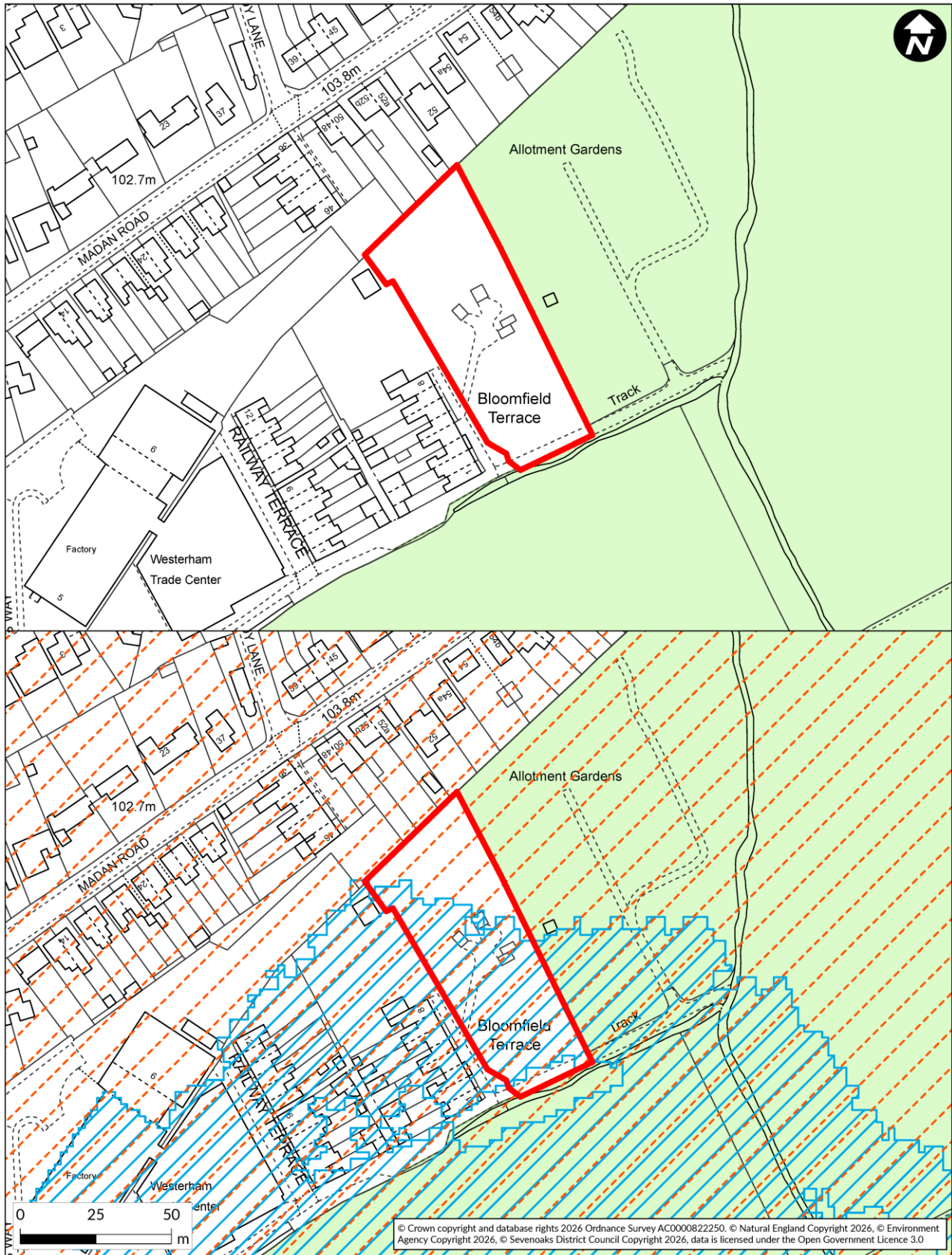
SHELAA 2026 CONCLUSIONS

Suitability	This is a partially brownfield site adjacent to the urban confines of New Ash Green, which is identified as a Primary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although it is noted that the site does not benefit from access to a nearby
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	train station. The site lies fully within the Green Belt but is considered to constitute grey belt land under national policy, due to its partial PDL status and performance against Green Belt purposes A, B and D. Consideration would need to be given to a new access and the capacity on the surrounding road network. A contaminated land assessment would be required for this site and further consideration would need to be given to the Grade 3 agricultural land quality and Ancient Woodland buffer. The site does not lie within National Landscapes. However, the site is almost wholly a Priority Habitat – traditional orchard and is sandwiched by Ancient Woodland and therefore is considered unsuitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is almost wholly traditional orchard, which is a priority habitat and is surrounded by Ancient Woodland and is therefore considered unsuitable for allocation.

HO/21/00282
Land North-East of Bloomfield Terrace, Westerham



SITE DETAILS	
SHELAA Reference	HO/21/00282
Site Area (Ha)	0.33
Developable Area (Ha)	0.33
Brownfield / Greenfield	Greenfield
Planning History	None.
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site within the urban confines of Westerham. The site is currently leased to home owners of Bloomfield Terrace and forms additional garden space with a number of outbuildings. There is an existing access to the site in the form of a track.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Within urban confines of Westerham
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Majority within Westerham Urban Confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Urban Confines of Westerham	
Green Belt Stage 3	Not in Green Belt	
National Landscapes	100% within Kent Downs National Landscapes	
Landscape Sensitivity	Not within Landscape Sensitivity Area	
Agricultural Land Quality	Urban – 100%	
Flood Risk	Flood Zone 2 (63.81%)	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not within vicinity of heritage assets	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	Air Quality Assessment (impact on local AQMA)	
Mineral Safeguarding Area	Within Silica Sand - Construction Sandstone - Folkestone Formation	
Site Access	Access issues	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 400m of Westerham	
Town and Local Centres	Within 800m of Westerham Town Centre.	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
16	6	4

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site located within the urban confines of Westerham, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although it does not benefit from access to a train station. The site is fully within the Kent Downs National Landscape. There is an existing access in the form of a track, however it is not adopted by KCC (Private Access) and has been assessed as being a difficult access to overcome. Consideration should also be given to the limited capacity on the surrounding transport network. The site lies partially within Flood Zone 2, which would need further consideration. There are no other constraints which would make the site unsuitable. However, due to access issues and limited capacity on the transport network, the site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to access issues and therefore is not proposed for allocation.

HO/21/00295
Rear of 1 - 31 Pilgrims Way Cottages, Pilgrims Way, Kemsing



SITE DETAILS	
SHELAA Reference	HO/21/00295
Site Area (Ha)	0.57
Developable Area (Ha)	0.57
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO340, HO396
Site Description	This is a greenfield site within the urban confines of Kemsing. The site comprises part of the residential gardens associated with Pilgrims Way Cottages. The site is bound by residential development to the north, east and west and Kemsing Primary School to the south.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Within urban confines of Kemsing
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Completely within Kemsing	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within urban confines	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Within 100m buffer of Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban - 100.0%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Kemsing Conservation Area; Within 200m of 7 Listed Buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	Within Kemsing	
Town and Local Centres	Within 2km of Kemsing, The Parade	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
18	4	4

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site within the urban confines of Kemsing, which is identified as a village in the Settlement Hierarchy. The site is not directly adjacent to the settlement boundary. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although does not have nearby access to a train station. However, it is considered that the site will be difficult to access and that there no capacity on the surrounding transport network. Due to access issues to the site, it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 6-10
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Not currently developable
	Do not include in Plan
SDC Comments	The site is considered to have access issues and therefore, the site is not proposed for allocation.

HO/24/00002
Land at Broomhill Bank School (North), Hextable (Plot 3b)



SITE DETAILS	
SHELAA Reference	HO/24/00002
Site Area (Ha)	0.78
Developable Area (Ha)	0.78
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site within the urban confines of Hextable. The site comprises an area of grassland forming part of the current school grounds at Broomhill Bank School. The site is bound by educational use to the north, Top Dartford Road to the east and south, and Rowhill Road to the west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within urban confines of Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within Hextable urban confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	Yes – Open Space Furness School Playing Field	
Proposed use / designation	No	
Green Belt	Within Urban Confines of Hextable	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not within vicinity of heritage assets	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not in a Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Not within 2km of Train Station	

GREEN	AMBER	RED
23	0	3

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site situated within the urban confines of Hextable, which is identified as a Secondary Service Centre in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities. However, it is noted that the site is not well located for public transport, being over 2km from the nearest train station. It is considered that there is existing capacity on the transport network, although new access options will need to be provided for this site. The site does not lie within the Green Belt or National Landscapes, although the site is within an Open Space allocation. Due to the fact that the site is within an Open Space constraint, this site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable.

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is considered unsuitable due to the open space constraint.

HO/24/00003
Land at Broomhill Bank School (north), Hextable (Plot 2)



SITE DETAILS	
SHELAA Reference	HO/24/00003
Site Area (Ha)	0.37
Developable Area (Ha)	0.37
Brownfield / Greenfield	Partially Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a partially brownfield site within the urban confines of Hextable. The site comprises redundant buildings in education use, associated hardstanding and dense tree coverage to the east. The site is bound by Puddledock Lane to the north, Top Dartford Road to the east and Broomhill Bank School to the south and west. The site has an existing access through the school site.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Within urban confines of Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Completely within Hextable	
Land Use (GF/PDL)	Mixed (Greenfield and PDL)	
Existing use	Yes, but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Urban Confines	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Within SW1 Swanley North including Hextable: Low-medium	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not within the vicinity of a heritage asset	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Requires new access	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from Train Station	

GREEN	AMBER	RED
22	3	1

SHELAA 2026 CONCLUSIONS

Suitable?	This is a partially brownfield site within the urban confines of Hextable, which is identified as a Secondary Service Centre in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities. However, it is noted that the site is not well located for public transport, being over 2km from the nearest train station. It is considered that there is existing capacity on the transport network, although contributions may still be sought. Whilst the site benefits from existing access via the school site at Broomhill Bank, it is considered that a new access would be required. The site does not lie within the Green Belt or National Landscapes. However, the site does comprise sport and leisure facilities and the loss of this use would not be supported. Accordingly, due to the loss of sport and leisure facilities, this site is not considered to be suitable for residential development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is not considered suitable for development due to the loss of sport and recreational use.

HO/24/00012
Land at London Road, Westerham



SITE DETAILS	
SHELAA Reference	HO/24/00012
Site Area (Ha)	0.45
Developable Area (Ha)	0.45
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site adjacent to the urban confines of Westerham. The site currently comprises an open field. The site is bound by open countryside to the north, London Road to the east and residential to the south and west. The site does not currently benefit from an existing access.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Westerham
Conclusion	PROGRESS TO FULL ASSESSMENT

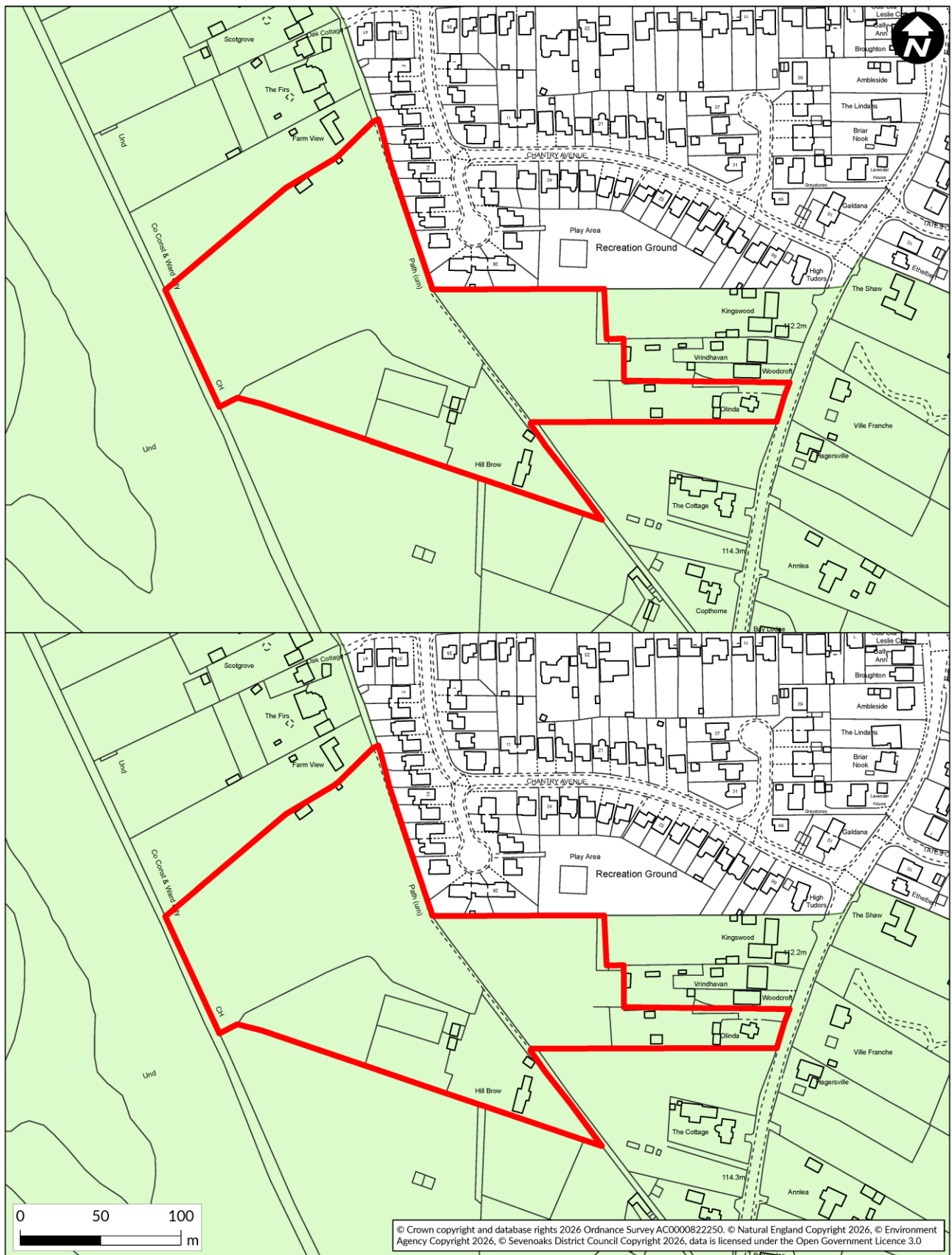
SHELAA ASSESSMENT		
Within Urban Confines	Adjacent Westerham	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Urban Confines	
Green Belt Stage 3	Not assessed	
National Landscapes	Within National Landscapes	
Landscape Sensitivity	Medium	
Agricultural Land Quality	Grade 3 (58.69%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 1 listed building	
Contamination Issues	Contaminated land assessment – former of adjacent land use	
Noise Pollution	Noise assessment – rail/traffic noise	
Air Quality	No specific risk	
Mineral Safeguarding Area	37.37% within Silica Sand – Construction Sandstone – Folkestone Formation	
Site Access	Requires new access	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent Westerham	
Town and Local Centres	Within 800m of Westerham Town Centre	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
13	10	3

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt site situated adjacent to the urban confines of Westerham, which is identified as a Town in the Settlement Hierarchy 2025, and therefore is considered to be in a sustainable location. The site is close to existing key services and facilities in Westerham. The site lies fully within the Green Belt and has not been assessed in regards to grey belt through the 2025 Green Belt assessment, due to its position as a greenfield site fully within National Landscapes. The site is fully medium-high landscape sensitivity which would require further consideration. The site would require a new access, as well as an additional access for emergency use. The site also lies fully within the National Landscapes. Due to being highly constrained, the site is not considered to be suitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	Due to being highly constrained in the National Landscape, the site is not considered suitable for development.



SITE DETAILS	
SHELAA Reference	HO/24/00016
Site Area (Ha)	3.64
Developable Area (Ha)	3.64
Brownfield / Greenfield	Partially brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a partially brownfield site adjacent to the urban confines of Hartley. The site comprises large area of land in agricultural use. The site is bound by residential and a recreation ground to the north, Ash Road to the east, residential and agricultural land to the south and agricultural to the west. The site benefits from an existing access off Ash Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Hartley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hartley	
Land Use (GF/PDL)	Partially Brownfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	Open Space: Chantry Avenue Woodland, Hartley Natural & Semi Natural (53.19%)	
Green Belt	In green belt adjacent to Hartley	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 3 (71%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage asset	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Hartley	
Town and Local Centres	Within 800m of Hartley, Cherry Trees Within 2km of Longfield and New Ash Green Village Centre	
Train Station	Over 2km from a train station	

GREEN	AMBER	RED
20	4	2

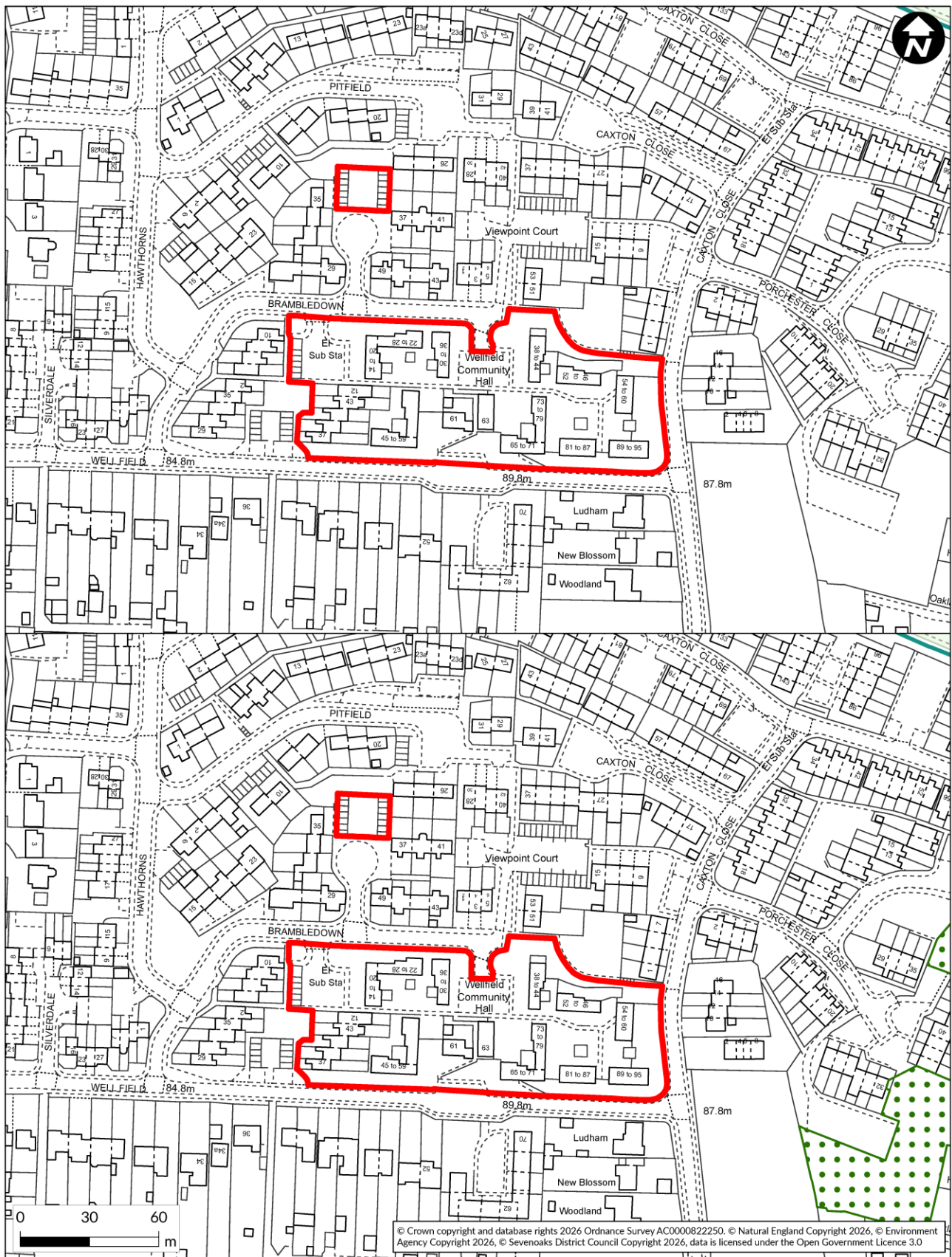
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a partially brownfield site situated adjacent to the urban confines of Hartley, which is identified as a Primary Service Centre in the Settlement Hierarchy 2025, and therefore is considered to be in a sustainable location. The site is close to existing key services and facilities in Hartley, New Ash Green and Longfield, although it is noted that the site lies more than 2km from a train station. The site lies fully within the Green Belt, however is considered to constitute grey belt land under national policy, due to its partial brownfield status and performance against Green Belt purposes A, B and D. The site is partially within Chantry Avenue Woodland and majority within Grade 3 agricultural land, and therefore the site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is constrained by open space designation and grade 3 agricultural land quality and therefore is unsuitable for development.

HO/25/00028
Land at Brambledown and Wellfield, Hartley



SITE DETAILS	
SHELAA Reference	HO/25/00028
Regulation 18 2025 Reference	HART2
Site Area (Ha)	0.97
Developable Area (Ha)	0.97
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site within the urban confines of Hartley. The site is split into two parcels of land. Parcel A (northern-most parcel) comprises residential garages and associated hardstanding and is bound by residential development to the north, east and west and Brambledown to the south. Parcel A benefits from existing access off Brambledown. Parcel B (southern-most parcel) comprises a number of residential dwellings, residential garages and associated hardstanding, Wellfield Community Hall and amenity green space. Parcel B is bound by residential development to the north and west, Brambledown to the north, Caxton close to the east and Well Field to the south. Parcel B benefits from existing vehicular access off Brambledown and Well Field and public footpath access from Brambledown throughout the site.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within urban confines of Hartley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within Hartley	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes, but not allocated and to be reprovided	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Urban Confines	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	Contaminated land assessment – sub station and former land use	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Hartley	
Town and Local Centres	Within 2km of Hartley, Cherry Trees and Longfield	
Train Station	Within 2km of Longfield	

GREEN	AMBER	RED
22	4	0

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	No responses were received from Statutory Consultees.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hartley Parish Council</u> A response from Hartley Parish Council welcomes the allocation of this site in the Local Plan, noting that it is a brownfield site within the urban confines of the settlement. The response makes some specific suggestions surrounding the capacity of the site, community facilities, amenity open space, contaminated land and concerns regarding the relocation of existing residents.
Other Consultation Bodies	A response from Tom Tugendhat, MP, sets out that HART2, Land at Brambledown and Wellfield, Hartley, has been put forward and is considered development within Hartley itself. Whilst he notes this is preferable to an expansion of the village, residents in Well Field, Brambledown, Woodland Avenue and Caxton Close have highlighted what little information is available about the scope of development, given its proximity to existing residential properties. He would be grateful if SDC could encourage the promoters to share additional information about its intentions, so residents can be fully aware of the likely impact of this development on their immediate neighbourhood.
General Response	Respondents insist on replacing the community hall on Site HART2 with a facility that matches or exceeds existing size and standard, retaining associated green space and avoiding service interruption, and preserving all current amenity open areas with net gains for biodiversity. They request contamination checks and groundwater protection for former substation and garage sites and building heights and designs that respect local character and prevent overlooking. Smaller homes are preferred and parking provision must offset lost garages. Respondents highlight limited transport capacity on single-carriageway roads and scarce public transport, and they call for assessment of healthcare and education capacity. Clear site access arrangements, developer commitments, mitigation funding and relocation assistance are needed to safeguard services, local identity and Green Belt boundaries.

Key issues raised	Community facilities (community hall) Amenity open space, biodiversity and local character Contaminated land and groundwater protection Housing density, mix, scale and design Transport and highway capacity Local healthcare capacity Parking provision and local car parking Education capacity
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SITE PROMOTER RESPONSE

No formal response to the Regulation 18 consultation was received from the site promoter. However, it is noted that there is uncertainty surrounding who is promoting this site for allocation in the Local Plan.

SHELAA 2026 CONCLUSIONS

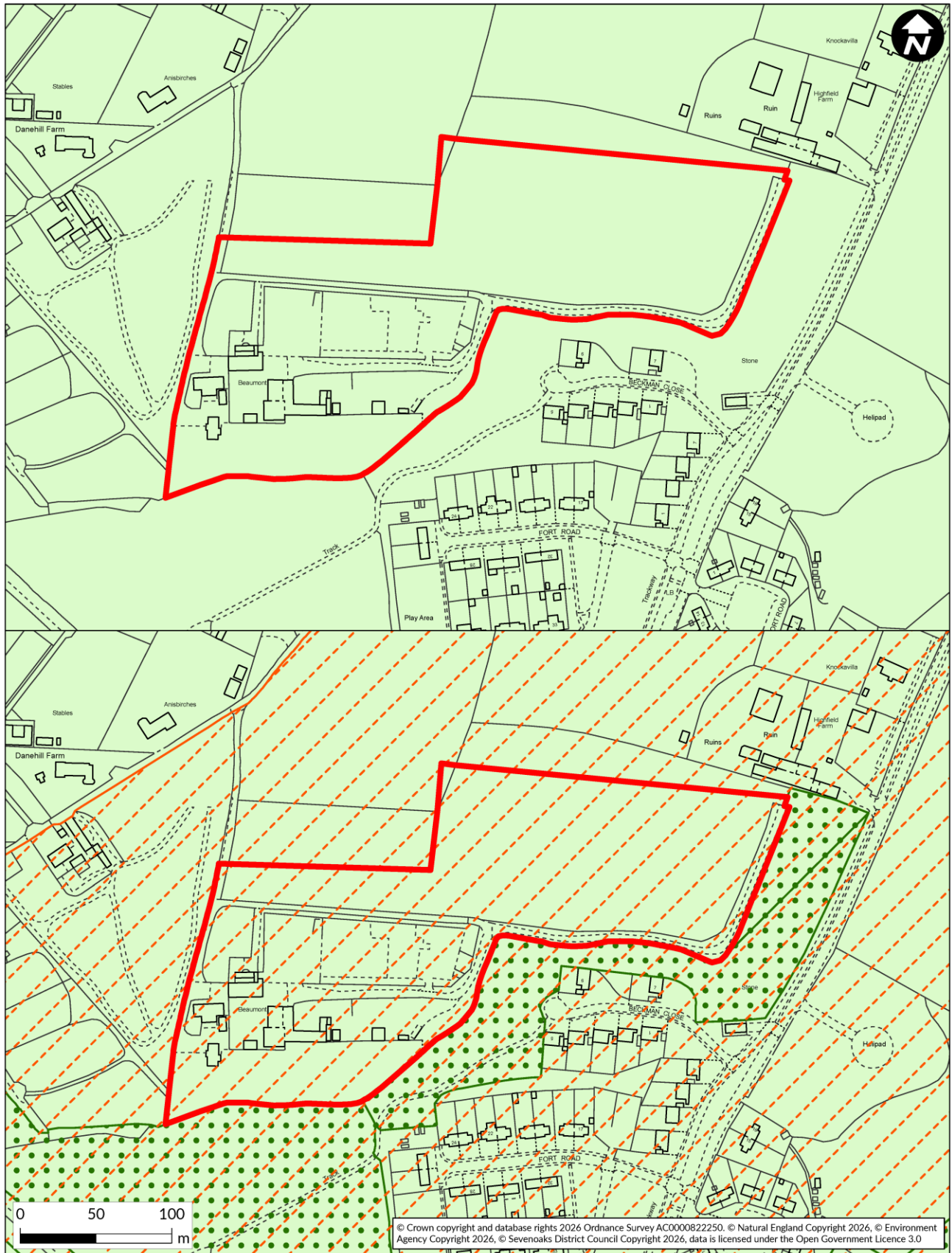
Suitable?	This is a brownfield site situated within the urban confines of Hartley, which is classified as the Primary Service Settlement in the Settlement Hierarchy 2025, and therefore the site is considered to be within a sustainable location, close to key services and facilities, and within walking distance of Longfield Station. It is considered that there is existing capacity on the surrounding transport network and the site benefits from existing access, however contributions towards improvements may still be sought. A contaminated land assessment would be required for this site due to the sub station and former land use. The site does not lie within the Green Belt or National Landscapes and there are no other constraints which would make this site unsuitable. Accordingly, due to the unconstrained nature of the site, it is considered suitable for development.
Availability	It is unclear who is promoting the site for development and whether the site is available within the Local Plan period. Accordingly, the site is considered unavailable in this iteration of the SHELAA.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan

SDC Comments

The site is considered unavailable due to uncertainty around site promotion within the Local Plan and is therefore unsuitable for allocation.

HO/25/00060
Beaumont, Otford Lane, Fort Halstead



SITE DETAILS	
SHELAA Reference	HO/25/00060
Regulation 18 2025 Reference	HAL3
Site Area (Ha)	4.97
Developable Area (Ha)	4.97
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	Residential, Commercial, Agricultural site, accessed from Otford Lane, in close proximity to Fort Halstead. Bounded by ancient woodland to the south and east, woodland to the west, Highfield Farm and agricultural land to the north.
Site Type	New build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – PDL site in vicinity of Fort Halstead
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	1.2km from Otford (adjacent to consented/in construction Fort Halstead development)	
Land Use (GF/PDL)	Mixed (brownfield/greenfield)	
Existing use	Residential, Commercial, Agricultural (not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Within Kent Downs National Landscape	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	92% Grade 3	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Adjacent to Ancient Woodland – 15m buffer	
Presence of Heritage Assets	Not in the vicinity of heritage assets	
Contamination Issues	Contaminated land assessment – former use of the site	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not in the vicinity of any mineral safeguarding area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Currently adjacent to hamlets/villages, but adjacent to consented/in construction Fort Halstead development	
Town and Local Centres	More than 2km from current town/local centre, but consented/in construction Fort	

	Halstead development will include a local centre	
Train Station	More than 2km from a train station	

GREEN	AMBER	RED
16	8	3

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site lies wholly within the Kent Downs National Landscape and is situated on previously developed land. The response also comments on the cumulative impact of surrounding proposed developed. The response notes that the site is also nearby to Ancient Woodland which is an irreplaceable habitat as well as Priority Habitats Inventory – Deciduous Woodland.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	No responses were received from Town and Parish Councils.
Other Consultation Bodies	<u>Kent Downs National Landscapes</u> A response from Kent Downs National Landscape objects to the proposed site allocation and cites concerns regarding the impact of substantial housing development within the Kent Downs National Landscape, arguing that it would conflict with national policy requiring great weight to be given to conserving and enhancing landscape character and scenic beauty. Whilst acknowledging that part of the site is previously developed land and is located near other proposed allocations at Crow Drive, it considers the proposal to be a large scale development on predominantly greenfield site in open countryside, outside any recognised settlement. The response highlights concerns that access would be via narrow, constrained rural lanes and notes the presence of extensive ancient woodland along the sites eastern and southern boundaries. It concludes that the development would be out of keeping with the existing settlement pattern, would fail to reflect the character and

	sensitivity of the Darent Valley Landscape Character Area, and would not conserve or enhance the natural beauty of the Kent Downs National Landscape and therefore requests that the allocation be removed. <u>The Woodland Trust</u> A response from The Woodland trust identifies that the site includes ancient woodland at the southern border of the site and makes associated recommendations for any allocation moving forwards.
General Response	Respondents note HAL3 provides vital green space for mental health, family use and village-centre footfall, alongside opportunities for open space, biodiversity net gain and affordable housing under grey-belt “golden rules”. They cite existing road access and single ownership near Fort Halstead enabling early delivery of 130 dwellings (potentially 201 with adjacent sites) and call for landscape and visual appraisal, ecological connectivity assessment and robust mitigation for ancient woodland and priority habitats, including at least 50 metre undeveloped buffers free of built form or private gardens, boundary revisions to protect irreplaceable habitats, cumulative masterplanning and specialist surveys for ancient trees.
Key issues raised	Community amenity, recreation and local centre viability Ancient woodland, priority habitats and ecological connectivity Access, highways and site boundaries Affordable housing, infrastructure and open space provision Deliverability and housing supply Kent Downs National Landscape and visual impact Grey Belt release policy and sequential approach Cumulative development and masterplanning

SITE PROMOTER RESPONSE

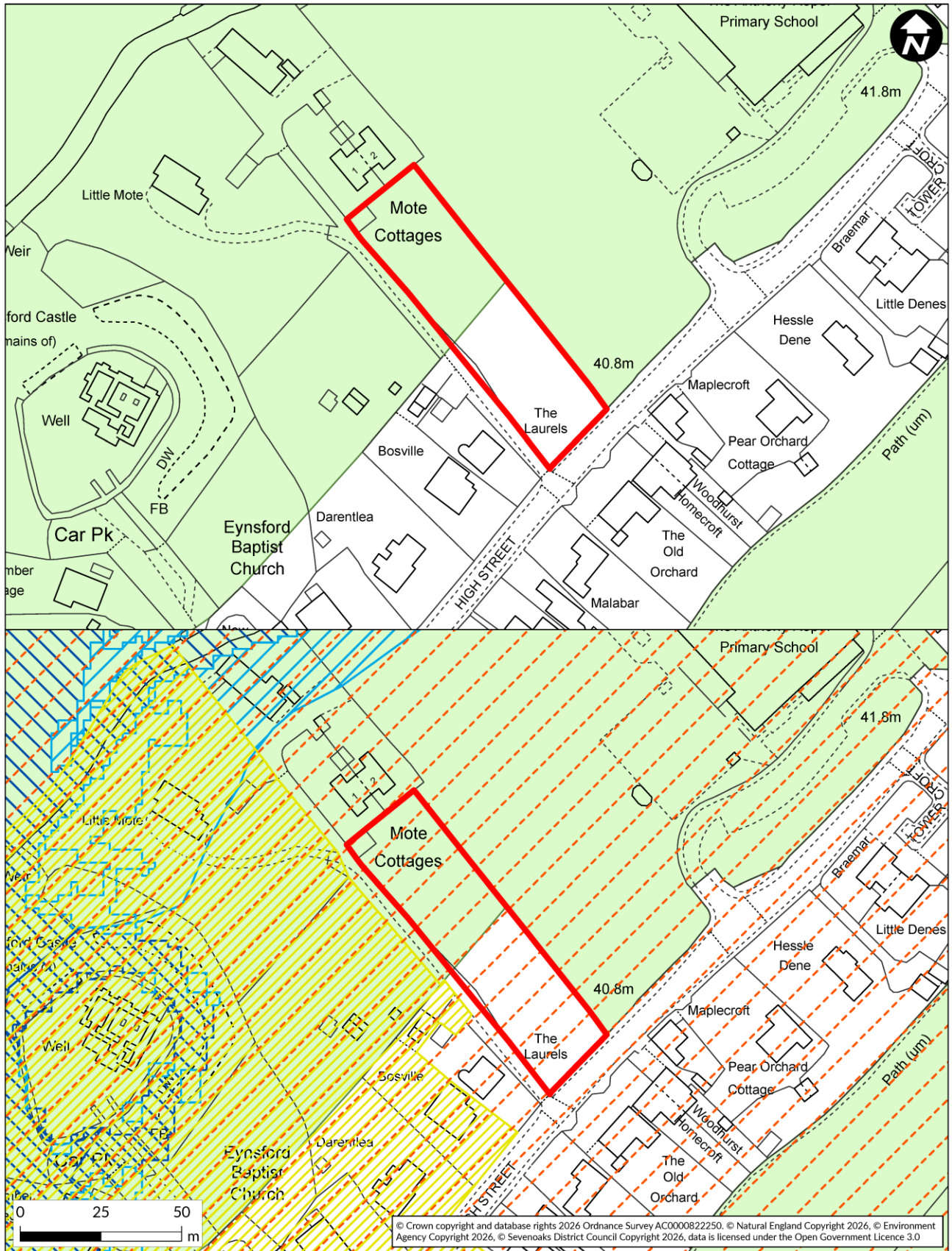
CBRE on behalf of BDW

A response from CBRE Planning on behalf of Barrat David Wilson Homes (BDW), as the site promoter, welcomes and supports the inclusion of the proposed site within the Local Plan. The response makes specific comment regarding the key benefits of allocating the site, access details, and other site specific considerations as well as comment on the wider Local Plan strategy.

SHELAA 2026 CONCLUSIONS	
Suitable?	This is a brownfield site in mixed use, adjacent to the to Fort Halstead, which itself has been consented for redevelopment. The site will benefit from the services and facilities provided by the adjacent development. It is noted that the site lies over 2km from a train station. The site lies fully within the Green Belt but is considered to be grey belt land under national policy, due to its PDL status and performance against Green Belt purposes A, B and D. The site will require a contaminated land assessment due to the former land use. Sensitive design required in relation to location in National Landscapes, and in close proximity to ancient woodland. The site is also Grade 3 agricultural land quality which would require further consideration. Due to the greenfield element of the wider site, ancient woodland and access concerns, the wider site is considered to be unsuitable for development and not in line with the wider Local Plan Development Strategy due to being greenfield within National Landscapes. However, a revised boundary of the site which aligns with the Previously Developed Land element of the site only has been reconsidered as part of this SHELAA iteration.
Availability	The site has been submitted to the call for sites and is considered to be available now
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is unsuitable due to being greenfield land within National Landscapes, the presence of Ancient Woodland and access concerns.

HO/25/00063
Land adjacent to Little Mote, High Street, Eynsford



SITE DETAILS	
SHELAA Reference	HO/25/00063
Site Area (Ha)	0.25
Developable Area (Ha)	0.25
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site within the urban confines of Eynsford. The site currently comprises vacant and undeveloped land. The site is bound by the Anthony Roper Primary School to the north, High Street, Eynsford to the east and residential development to the south and west. and green space to the south. The site does not currently benefit from an access point.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – partially within urban confines of Eynsford
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Partially within Eynsford	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Partially within Urban Confines	
Green Belt Stage 3	Partially Urban, Partial Grey Belt	
National Landscapes	Within Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban 33.38% Grade 4 66.62%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within Eynsford Conservation Area Within 200m of 12 Listed Buildings Within 200m of Scheduled Monument - Eynsford Castle	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Requires new access	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Partially within Eynsford	
Town and Local Centres	Over 2km from Town or Local Centre	
Train Station	Within 2km of Eynsford Train Station	

GREEN	AMBER	RED
17	6	3

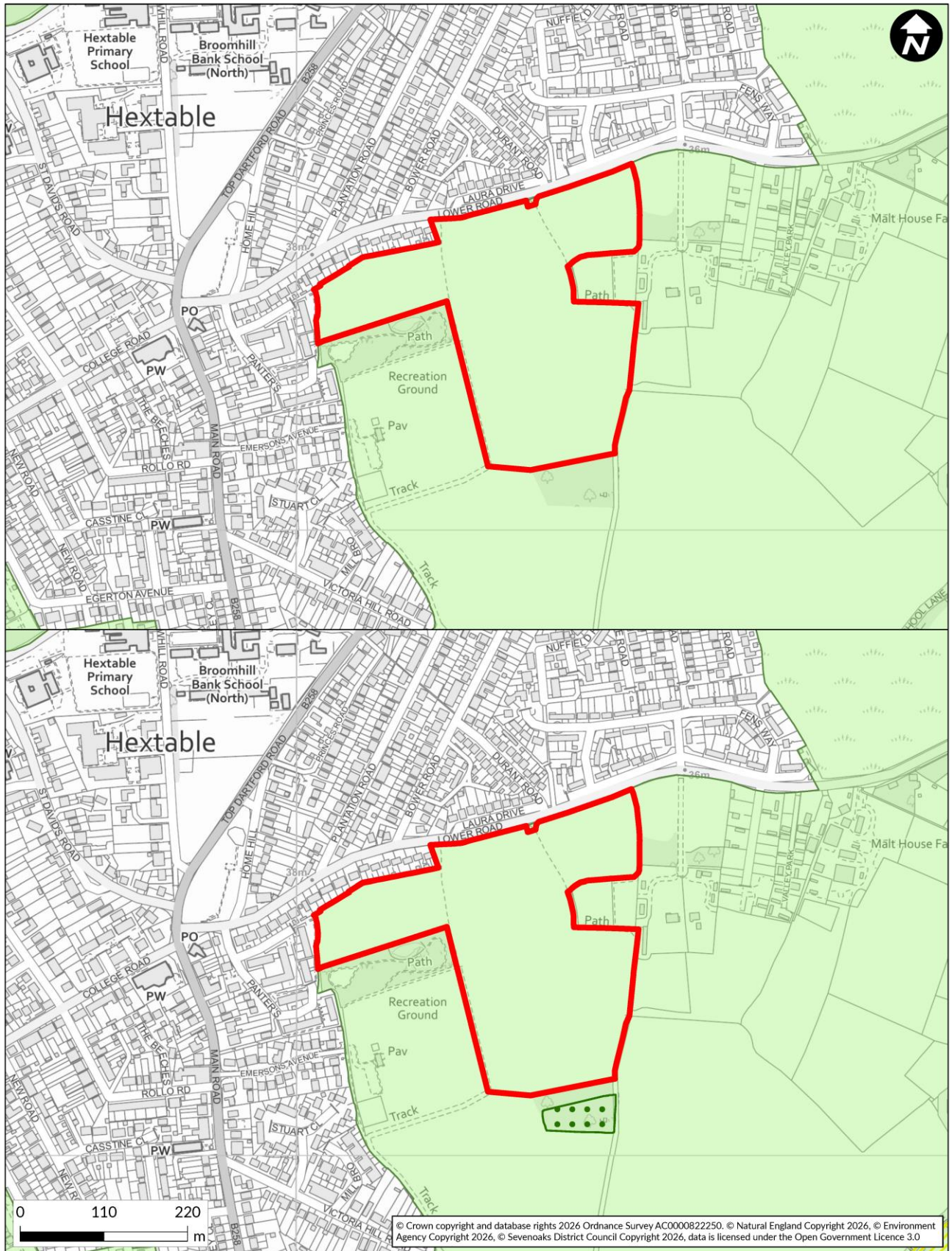
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site situated partially within the urban confines of Eynsford, which is classified as a Village in the Settlement Hierarchy 2025. The site is therefore not considered to be in one of the District's most sustainable location, although it is noted that Eynsford Village does have key services and facilities, as well as the site being within walking distance of Eynsford Train Station. It is considered that there is existing capacity on the surrounding transport network, however a new access may be required. The site lies partially within the Green Belt, although this element of the site is considered to constitute Grey Belt under national policy. The site lies fully within the Kent Downs National Landscapes. It is noted that the site lies within Eynsford Conservation Area, and within 200m of 12 listed buildings and Eynsford Castle which is a scheduled monument, and these may need further consideration. Due to an element of the site being greenfield land in the Green Belt and Kent Downs National Landscapes, the wider site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is considered unsuitable for development due to being partially greenfield Green Belt land within Kent Downs National Landscapes.

HO/25/00073
Land south of Lower Road, Hextable



SITE DETAILS	
SHELAA Reference	HO/25/00073
Site Area (Ha)	8.97
Developable Area (Ha)	8.97
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO/21/00223
Site Description	This is a greenfield site adjacent to the urban confines of Hextable. The site currently comprises a large area of agricultural land. The site is bound by Hextable Park to the West, Valley Park (G&T site) to the East and agricultural land to the South. The site does not currently benefit from an existing access
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to the urban confines of Hextable
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Hextable	
Land Use (GF/PDL)	Greenfield	
Existing use	Arable land	
Existing allocation / designation	None	
Proposed use / designation	No	
Green Belt	In Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within a National Landscape	
Landscape Sensitivity	100% within SW1 Swanley north including Hextable Residential Sensitivity: Low - Medium	
Agricultural Land Quality	80% Grade 2	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not within the vicinity of Heritage Assets	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	18.28% within River Terrace Deposits	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Hextable	
Town and Local Centres	Access point is within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from a train station	

GREEN	AMBER	RED
18	4	4

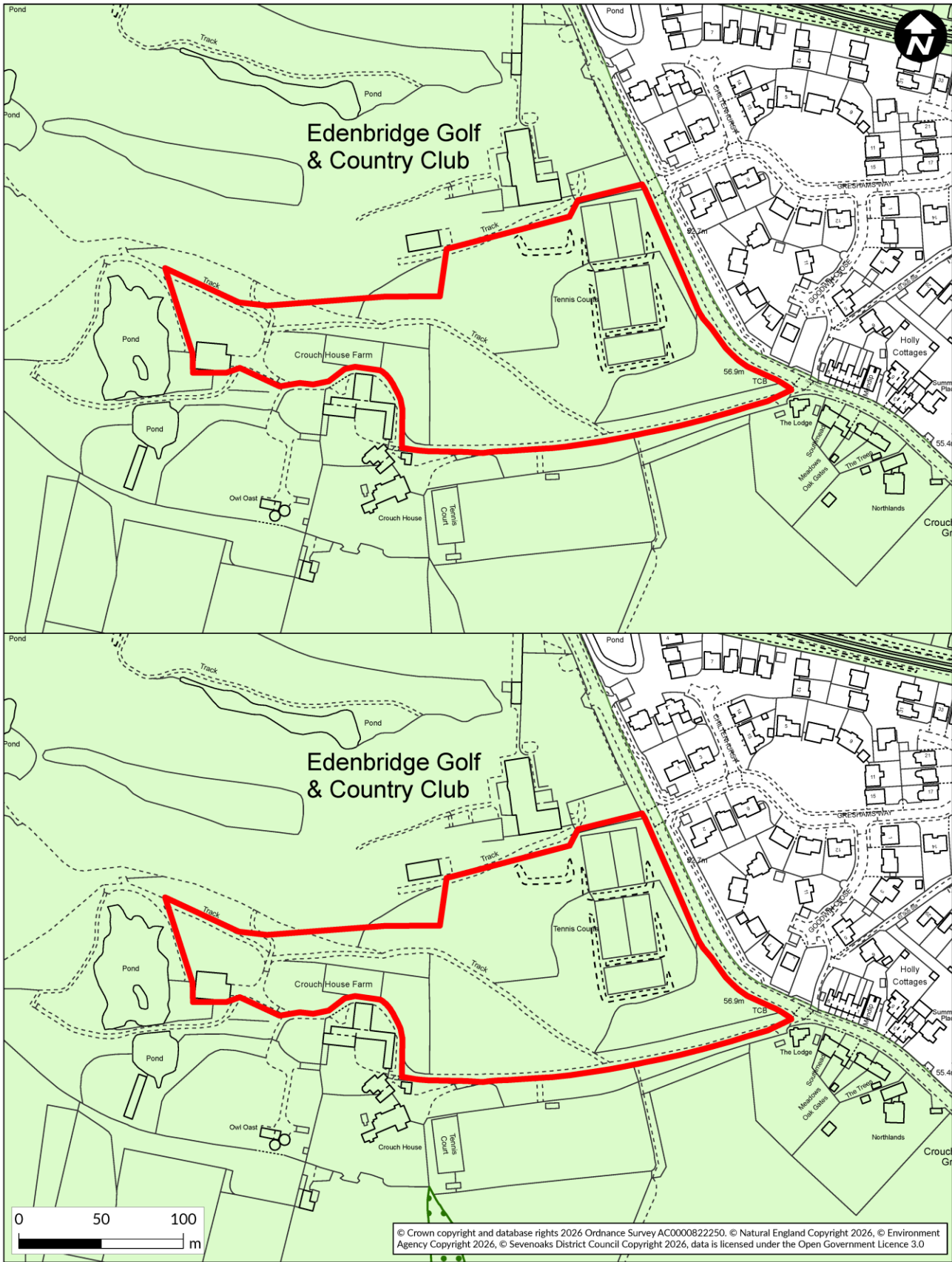
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt site adjacent to the urban confines of Hextable, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is considered to be in a sustainable location, close to key services and facilities, although does not benefit from access to a train station. The sites is mostly within the Green Belt but is Grey Belt under national policy. The site is not within National Landscapes. The site is Grade 2 agricultural land quality. A new access to the site would be required. However, it is considered that this site would present an unnatural extension to the Green Belt boundary of Hextable and therefore, due to this and Grade 2 Agricultural Land Quality, this site is considered to be unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is considered unsuitable due to agricultural land quality and is considered to be an unnatural extension to the urban confines.

HO/25/00080
Derelict land to the west of Crouch House Road, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/25/00080
Site Area (Ha)	3.08
Developable Area (Ha)	3.08
Brownfield / Greenfield	Partially Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a partially brownfield site adjacent to the urban confines of Edenbridge. The site comprises disused tennis courts, a residential property and a large area of greenfield land. The site is bound by Kent and Surrey Driving Range to the north, Crouch House Road to the east, residential and agricultural land to the south and west. The site has an existing access off Crouch House Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In green belt adjacent to Edenbridge	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-high	
Agricultural Land Quality	Grade 3	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	Contaminated land assessment – former activity on land	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Edenbridge	
Town and Local Centres	Within 2km of Edenbridge - Central Area, Edenbridge – Northern Fringe and Edenbridge – Southern Fringe	
Train Station	Within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
17	7	2

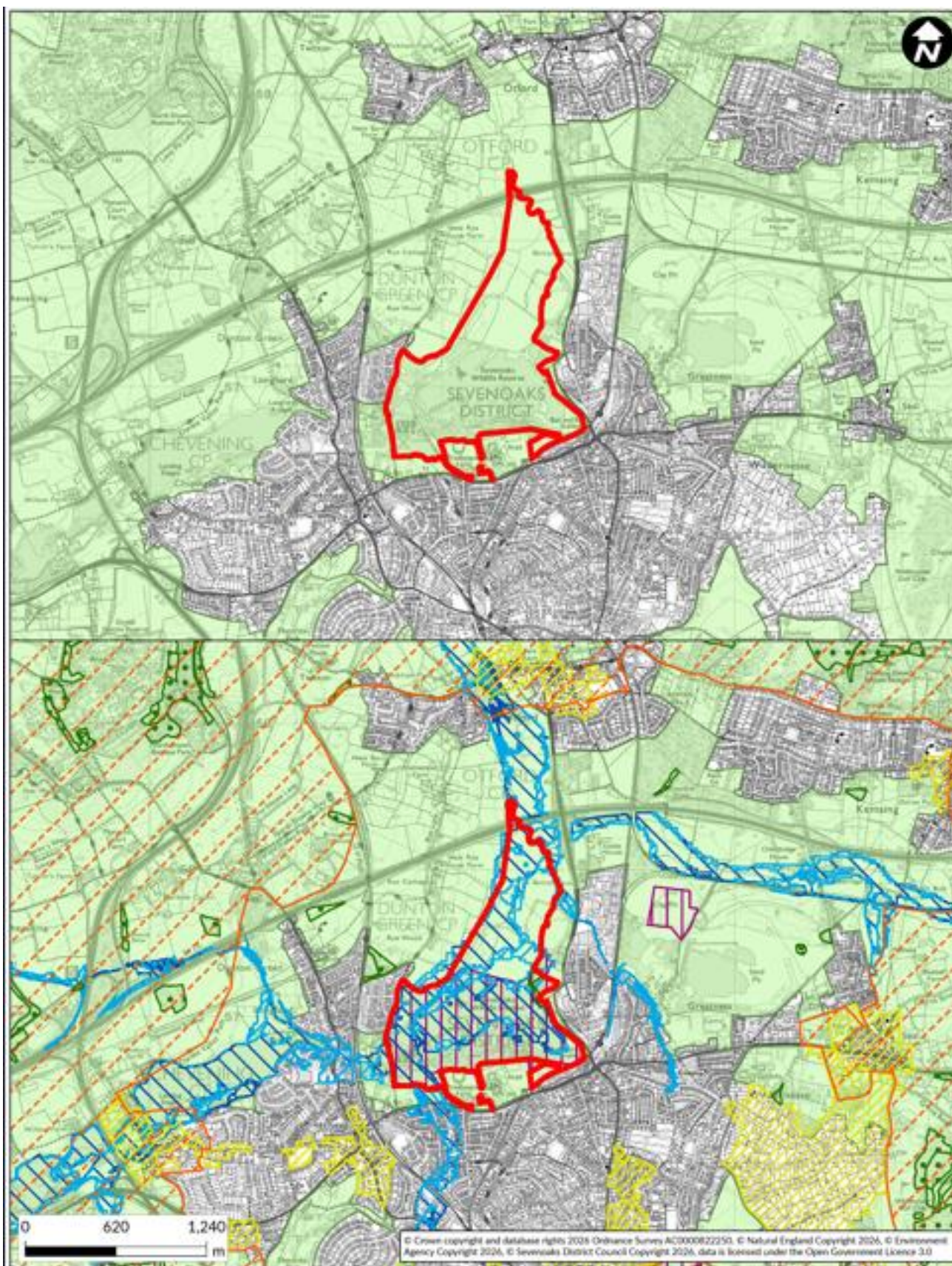
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a partially brownfield site adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy 2025, and is therefore considered to be in a sustainable location, close to key services and facilities and also lies within 2km of two railway stations. The site lies fully within the Green Belt and is considered to be grey belt under national policy, due to its partial PDL status and performance against Green Belt purposes A, B and D. The site is both medium-high landscape sensitivity and Grade 3 agricultural land quality, which would require further consideration. A contaminated land assessment would be required on the site due to former activity on the land. There are no other constraints which would make the site unsuitable. However, site is considered to present an unnatural extension to the urban confines of Edenbridge and therefore is considered unsuitable for allocation.
Availability	The site has been submitted by the landowner and is considered to be available in Years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered to present an unnatural extension to Edenbridge urban confines and therefore is not suitable for allocation.

HO/25/00081
Land North of Bradbourne Lakes, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/25/00081
Site Area (Ha)	116.54
Developable Area (Ha)	44.85
Brownfield / Greenfield	Greenfield (and blue infrastructure)
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a majority greenfield site is located to the north of Sevenoaks Urban Area, adjacent to the urban confines, and comprises part of the land separating Dunton Green and Greatness. The site includes the Bradbourne Lakes in the southern portion of the site and extends north to the M26.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Green Belt adjacent to Sevenoaks
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Green Belt adjacent to Sevenoaks town	
Land Use (GF/PDL)	Greenfield / blue infrastructure	
Existing use	No (agricultural)	
Existing allocation / designation	No	
Proposed use / designation	Sevenoaks Wildfowl Reserve, Sevenoaks Natural & Semi Natural 61%	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscape	
Landscape Sensitivity	Within S6 Sevenoaks north Residential Sensitivity: Low - Medium	
Agricultural Land Quality	Urban 15%, Other 42%, Grade 4 43%	
Flood Risk	12% in Flood Zone 2 and 52% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	61.51% within Sevenoaks Gravel Pits (SSSI)	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	0.84% within Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Within 200m of 5 listed buildings; 0.15% within 100m of Bradbourne Lakes Park Kent Compendium historic park / garden; Within 100m of 4 locally listed assets	
Contamination Issues	Contaminated land assessment – former land use	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	53% within Silica Sand - Construction Sandstone - Folkestone Formation; 78.0% within Sub Alluvial River Terrace	
Site Access	New access required	
Network Capacity	Limited capacity on transport network -would require improvements	
Settlement Classification	Within 400m of Sevenoaks town	

Town and Local Centres	Within 2km of Dunton Green; Riverhead Sevenoaks - Town Centre; St Johns, Tubs Hill and Sevenoaks Station	
Train Station	Within 2km of Bat and Ball; Dunton Green; and Sevenoaks stations	

GREEN	AMBER	RED
12	10	4

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

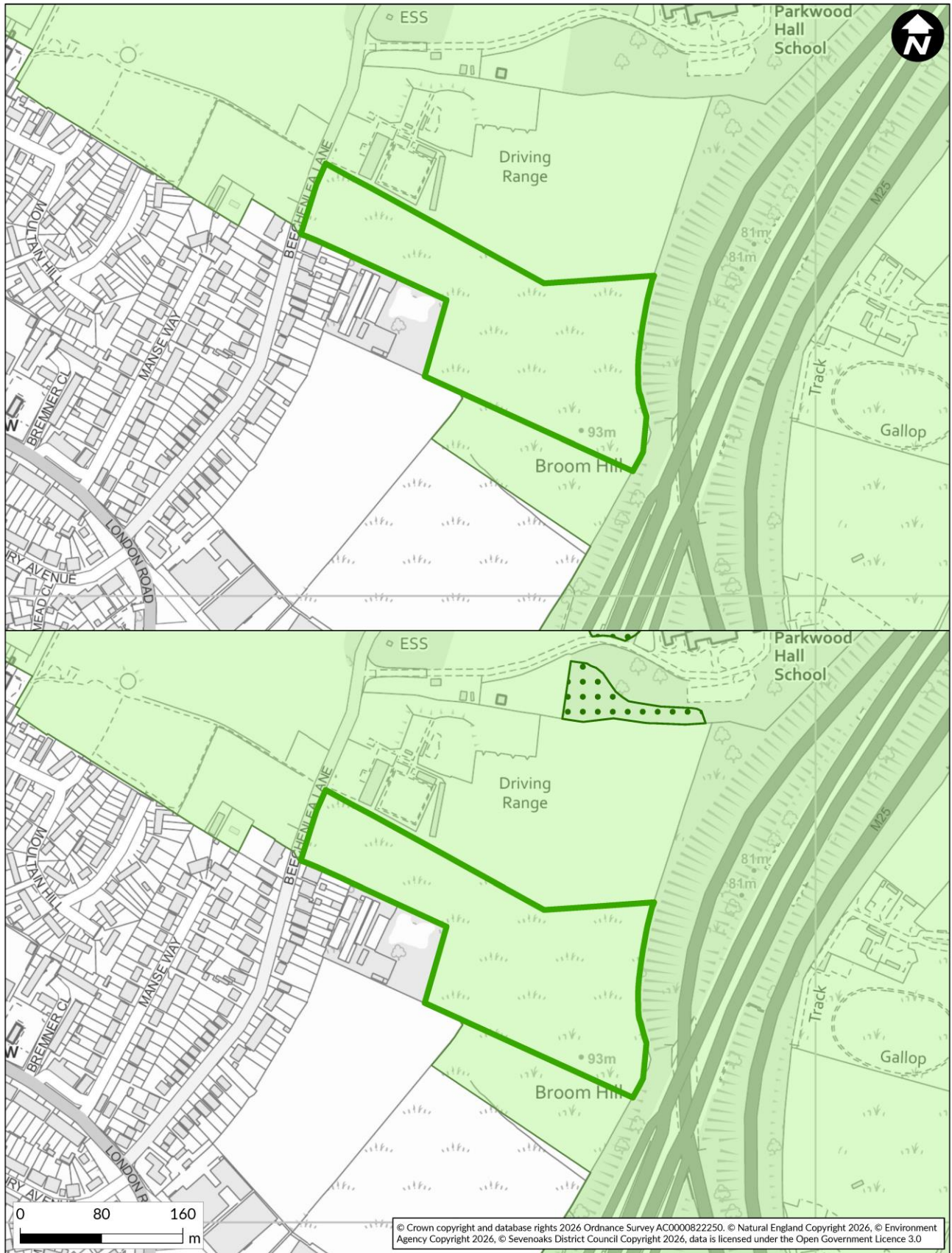
Suitable?	This is a majority greenfield site to the north of Sevenoaks Urban Area urban confines, which is identified as the District's Principal Town in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to key services and facilities, and also lies within 2km of both Dunton Green and Bat and Ball railway station. The site lies fully within the Green Belt, but is considered to be grey belt under national policy due to its performance against Green Belt purposes A, B and D. However, the site lies partially within the Sevenoaks Gravel Pits SSSI and partially within Flood Zones 2 and 3. In addition, the site is majority within two Mineral Safeguarding Areas. The site would require a contaminated land assessment due to former land use and a new accesses. The capacity on the surrounding transport network would also require consideration. Therefore, due to being heavily constrained, this site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 6-10
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan

SDC Comments

The site is heavily constrained by SSSI, Flood Zones 2 and 3 and Mineral Safeguarding Areas and is therefore not considered suitable for development.

HO/26/00009
Land east of Beechenlea Lane, Swanley



SITE DETAILS	
SHELAA Reference	HO/26/00009
Site Area (Ha)	4.16
Developable Area (Ha)	4.16
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site to the east of Swanley. The site currently comprises an area of open countryside and is bound by The Olympic sports facility to the north, the M25 to the east, open countryside to the south and Beechenlea Lane and residential to the west. The site does not currently benefit from an existing access and is bordered by a number of mature trees.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Swanley urban confines
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Swanley	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Adjacent to Swanley	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-Medium	
Agricultural Land Quality	Grade 3 (81.69%), Grade 2 (14.52%)	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Not within vicinity of heritage assets	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment required (M25)	
Air Quality	Air Quality assessment required (M25)	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New access required	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Within 400m of Swanley	
Town and Local Centres	Over 800m of Swanley – Manse Parade Within 2km of Swanley – Town Centre	
Train Station	Within 2km of Swanley	

GREEN	AMBER	RED
17	8	1

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Swanley, which is classified as a Town in the Settlement Hierarchy 2025, and therefore the site is considered to be within a sustainable location, close to key services and facilities, including being within 2km of Swanley train station. The site lies fully within the Green Belt, however is considered to be grey belt land, under national policy, due to its performance against Green Belt purposes A, B and D. The majority of the site is Grade 3 Agricultural Land Quality which will need further consideration. A new access would be required for the site, and capacity on the surrounding road network would require improvements. A noise and air quality assessment would be required due to the sites proximity to the M25 motorway. The site does not lie within National Landscapes and does not have any additional constraints which would make the site unsuitable for development. However, the site does contain Acid Grassland which is a priority habitat and part of the site is currently being preserved as a biodiversity area in relation to a recent planning permission. Accordingly, the site is considered unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site contains Acid Grassland, a priority habitat and is currently being preserved as a biodiversity area in relation to 20/03825/FUL and accordingly is considered unsuitable for development.

HO/26/00012
The Crown, London Road, Westerham



SITE DETAILS	
SHELAA Reference	HO/26/00012
Site Area (Ha)	0.37
Developable Area (Ha)	0.37
Brownfield / Greenfield	Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site situated within the urban confines of Westerham. The site currently comprises a large building in employment use as well as associated hardstanding and car parking. The site is bound by London Road to the east and south, employment and residential use to the west and residential to the north as well as a number of mature trees providing a buffer to the north and west of the site. The site has an existing access point off London Road to the east.
Site Type	Conversion
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within urban confines of Westerham
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within urban confines of Westerham	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes - employment use	
Existing allocation / designation	Yes – ADMP EMP1(x)	
Proposed use / designation	No	
Green Belt	Within urban confines	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Within Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Westerham Conservation Area Within 200m of 4 Listed Buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	13.22% within Silica Sand – Construction Sandstone – Folkestone Formation	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Westerham	
Town and Local Centres	Over 800m of Westerham Town Centre	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
21	1	4

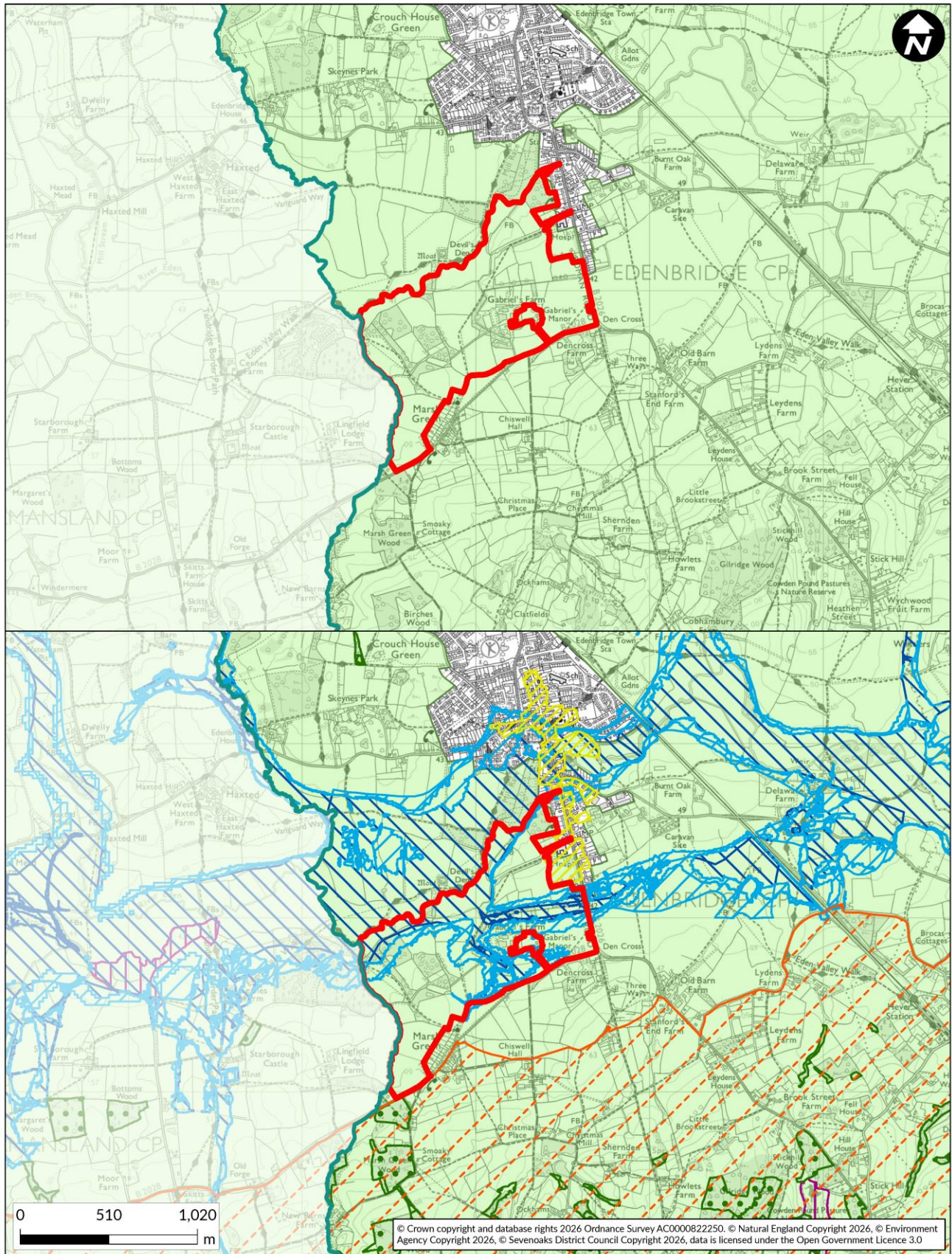
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a previously developed land site within the urban confines of Westerham, which is a Town in the Settlement Hierarchy 2025, and is accordingly considered to be in a sustainable location, close to key services and facilities. However, it is noted that this site lies over 2km from a railway station. The site lies fully within the Kent Downs National Landscapes, however is within the urban confines. The site lies within 200m of Westerham Conservation Area and 4 listed buildings, as well as being partially within Silica Sand – Construction Sandstone – Folkestone Formation mineral safeguarding area, which would need further consideration if a scheme in this location were to come forwards. There is considered to be capacity on the surrounding transport network and the site benefits from an existing access, although improvements may still be sought. The site is in Flood Zone 1 and there are no other constraints which would render the site unsuitable. However, the site does form part of an existing employment allocation, EMP1(x), as part of the Allocations and Development Management Plan (ADMP) and this is protected for employment use and therefore the loss of this to residential, as proposed by this site submission, would not be supported. Accordingly, the site is considered unsuitable for allocation for residential development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is an existing employment allocation and the loss of this would be resisted. Accordingly, the site is considered unsuitable.

HO/26/00013/B
Gabriels Farm, Marsh Green Road, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/26/00013/B
Site Area (Ha)	94.26
Developable Area (Ha)	94.26
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	The site comprises a large parcel of land to the east of the settlement boundary of Edenbridge, containing a large area of agricultural land and open countryside, a farm and associated buildings and hardstanding. The site lies adjacent to the District boundary with Tandridge. The site is bound by open countryside and agricultural land to north, south and west and the urban confines of Edenbridge and the B2026 to the east. The site benefits from an existing access off the B2026.
Site Type	New build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Edenbridge	
Land Use (GF/PDL)	Majority Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within the Green Belt (adjacent to urban confines of Edenbridge)	
Green Belt Stage 3	Grey belt	
National Landscapes	Within 100m buffer of High Weald National Landscapes	
Landscape Sensitivity	Medium	
Agricultural Land Quality	Grade 3 – 87.67%	
Flood Risk	18.77% within Flood Zone 2 and 27.42% within Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within or adjacent to SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Partially within Local Wildlife Site	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Adjacent to Ancient Woodland– 15m buffer	
Presence of Heritage Assets	Within 200m of Edenbridge Conservation Area Within 200m of 16 Listed Buildings Within 200m of Scheduled Monument	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Partially within Mineral Safeguarding Area	
Site Access	New access required	
Network Capacity	Limited capacity on transport network	
Settlement Classification	Adjacent to Edenbridge	
Town and Local Centres	Within 800m of Edenbridge Central Area Within 800m of Edenbridge Northern Fringe Within 800m of Edenbridge Southern Fringe	
Train Station	Within 2km of Edenbridge Town station	

GREEN	AMBER	RED
12	13	1

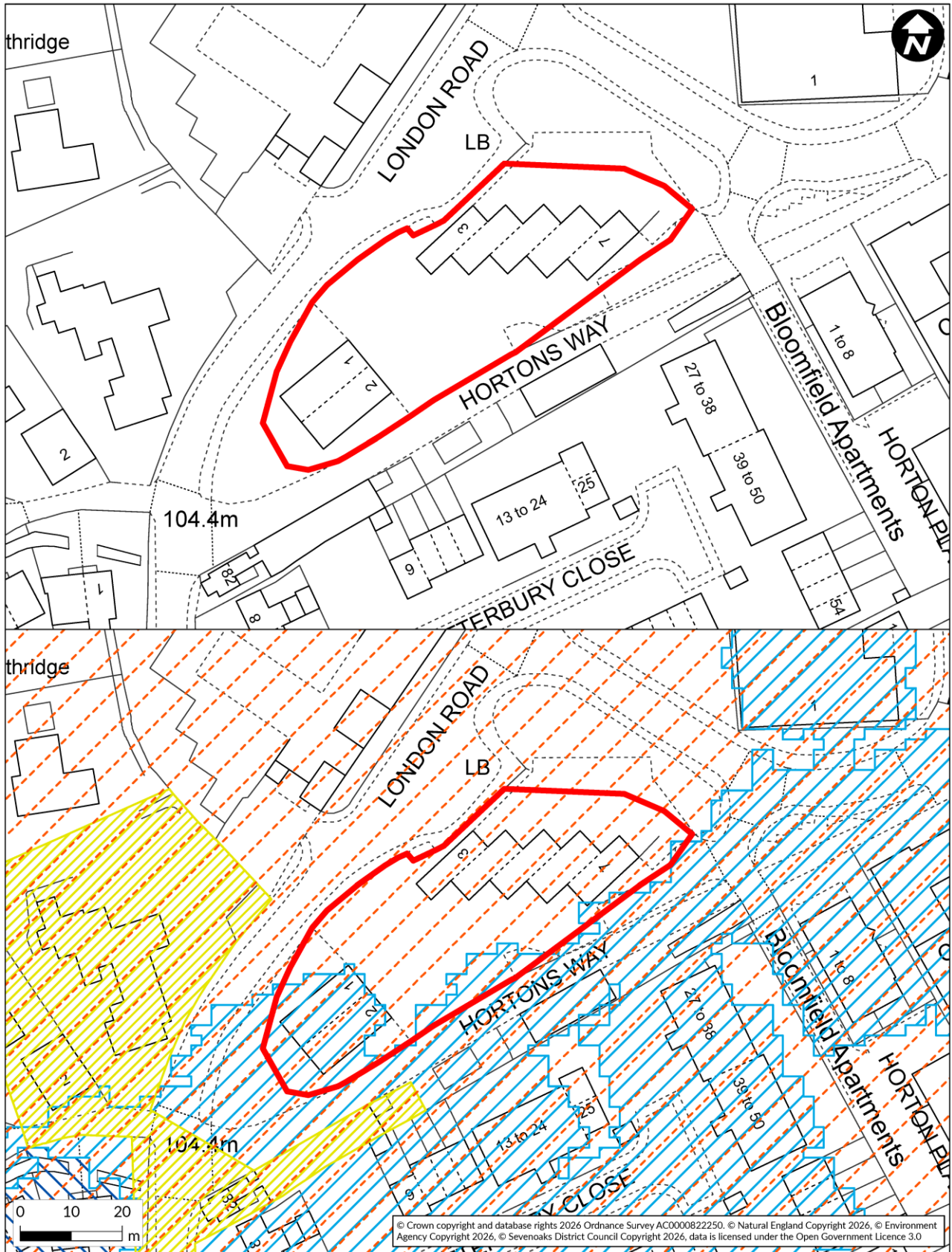
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt site situated adjacent to the urban confines of Edenbridge, which is identified as a Town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing services and facilities, including being within 2km of Edenbridge Town Centre, although it is highlighted that given the size of this site, the western portion of the site is further away from these facilities and therefore considered to be less sustainable. The site lies fully within the Green Belt and is considered to constitute grey belt land due to the sites performance against Green Belt purposes A, B and D. The site lies within 200m of Edenbridge Conservation Area, 16 Listed Buildings and a Scheduled Monument which would require further consideration should a scheme come forwards. The site lies partially within Flood Zones 2 and 3. The site also lies within a 15 buffer of Ancient Woodland and 100m buffer of the High Weald National Landscapes. The site does benefit from an existing access, however a new access would be required due to the size of the site. There is limited capacity for a site of this size on the surrounding transport network and improvements would be required. Primarily due to the landscape constraints, and the location of the site, with the majority of the site not adjacent to the settlement (which would leave a 'gap' in the Green Belt) it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site would present an unnatural extension to the urban confines of Edenbridge and therefore is not considered suitable for development.

MX/21/00003
Units 1-7 Westerham Trade Centre



SITE DETAILS	
SHELAA Reference	MX/21/00003
Site Area (Ha)	0.24
Developable Area (Ha)	0.24
Brownfield / Greenfield	Brownfield
Planning History	ADMP Allocation EMP1(x)
Previous SHELAA Ref (2018)	N/A
Site Description	This is a brownfield site within the urban confines of Westerham. The site comprises seven commercial units, 1-2 storeys in height and an area of hardstanding. The site is bound by Hortons Way to the south, London Road to the north and The Flyers Way to the east.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Within urban confines of Westerham
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Within Westerham	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes (Allocated Use)	
Existing allocation / designation	Yes (Westerham Trading Centre, Westerham)	
Proposed use / designation	No	
Green Belt	Within Urban Confines	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	100% within Kent Downs National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban 100.0%	
Flood Risk	Partially within Flood Zone 2 (25.09%)	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of Westerham conservation area Within 200m of 3 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Completely within Westerham	
Town and Local Centres	Within 800m of Westerham Town Centre	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
20	2	4

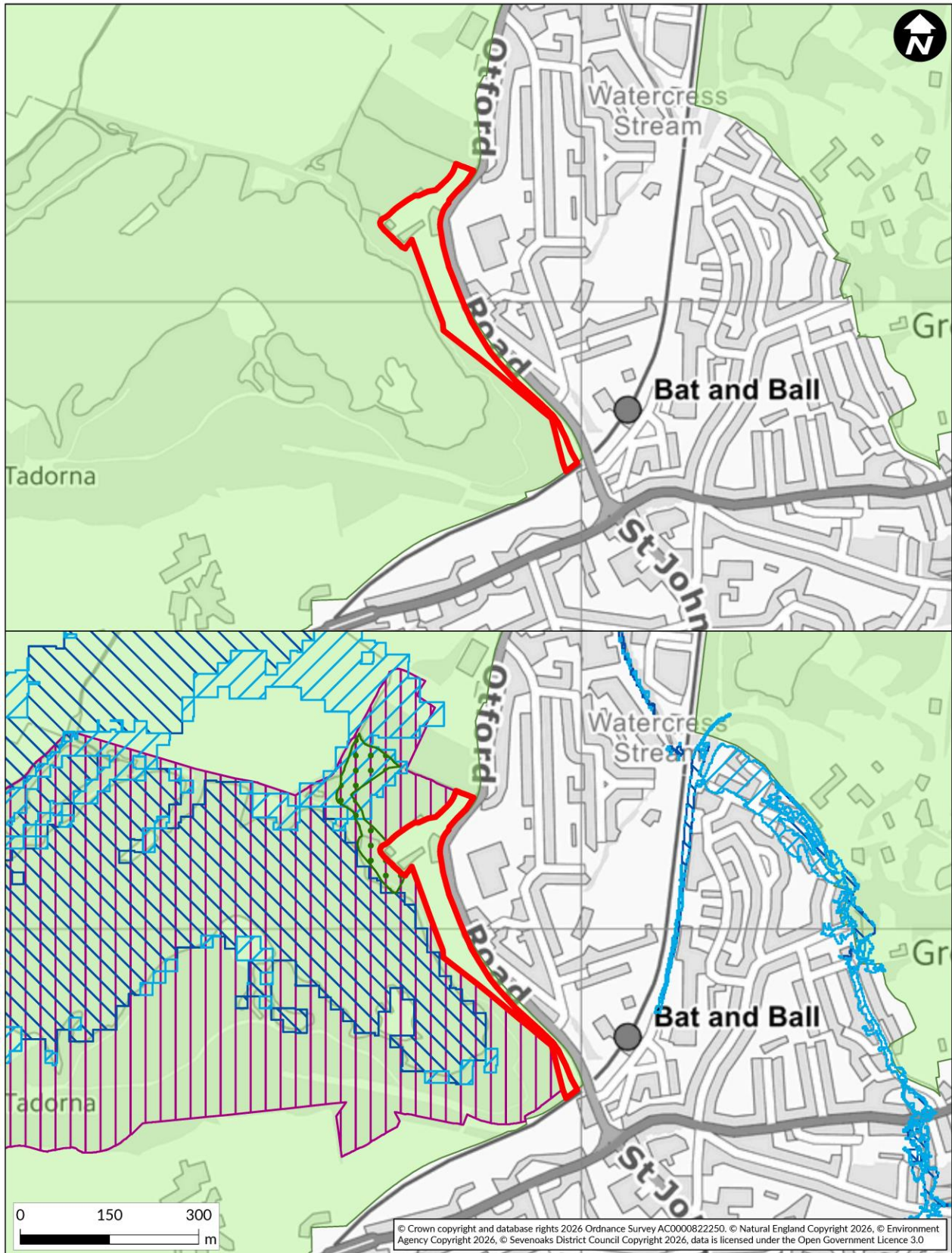
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a brownfield site within the urban confines of Westerham, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although doesn't benefit from access to a train station. The site lies fully within the Kent Downs National Landscapes. The site lies partially within Flood Zone 2, which would need further consideration. The site is allocated for employment use in the Allocations and Development Management Plan (ADMP) and the proposal is not considered to retain an acceptable amount of employment floorspace. Therefore it is not considered suitable to allocate this site for a differing use.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is constrained by the Kent Downs National Landscapes and is allocated in the ADMP for Employment use. Therefore, the site is not proposed for allocation for a differing use.

MX/21/00023
Bakers Yard, Otford Road, Sevenoaks



SITE DETAILS	
SHELAA Reference	MX/21/00023
Regulation 18 2025 Reference	SEV25
Site Area (Ha)	2.05
Developable Area (Ha)	2.05
Brownfield / Greenfield	Partially brownfield
Planning History	None
Previous SHELAA Ref (2018)	MX21
Site Description	This is a partially brownfield site adjacent to the urban confines of Otford. The site comprises a mix of uses including a commercial yard containing a number of temporary buildings and a large car parking area to the north, a residential dwelling and area of glasshouses. The site is bound by Otford Road to the east, the railway line to the south and woodland and the local nature reserve to the west and north.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to Sevenoaks)	
Land Use (GF/PDL)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Partially within Green Belt OR Within (but adjacent to Urban Confines of Sevenoaks)	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	99.6% Low - Medium, Commercial Sensitivity: Low - Medium	
Agricultural Land Quality	Urban - 64.83%; Grade 4 - 35.17%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Partially within a SSSI 0.01%	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	5.57% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Within 200m of 1 listed buildings	
Contamination Issues	Contaminated Land Assessment (former land use)	
Noise Pollution	Noise Assessment (commercial)	
Air Quality	Air Quality Assessment (for site and impact on local AQMA)	
Mineral Safeguarding Area	Partially within Mineral Safeguarding Area 88.93%	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	100.0% within 400m of Sevenoaks	
Town and Local Centres	Within 800m of St Johns (walkable in 10 minutes)	

Train Station	Within 800m of Bat and Ball Station (walkable in 10 minutes)	
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GREEN	AMBER	RED
14	12	0

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> This site lies immediately adjacent Sevenoaks Gravel Pits SSSI. As such, an assessment of any potential adverse impacts on the SSSI as a result of development will be required as part of any planning application. If necessary, the proposals should also include adequate mitigation measures, both during construction and operation, to ensure no adverse effects on the SSSI as a result of proposed development or in combination with other developments. Sevenoaks Gravel Pits SSSI is designated for its assemblages of breeding birds and associated lowland open waters habitat. Adjacent development will therefore need to consider potential impacts including noise/vibration/visual/light pollution, surface water run-off (quality and quantity), air quality during construction, and recreational disturbance from increased visitor usage of the site. Adjacent development should also consider how it can support responsible access and SSSI enhancement by integrating suitable ecological connectivity
Neighbouring Authorities	No responses received from Neighbouring Authorities.
Town and Parish Councils	<u>Sevenoaks Town Council</u> Sevenoaks Town Council notes that the site occupies a sensitive location, adjoining residential uses and acting as a buffer between the A225 and the Sevenoaks Nature Reserve SSSI. It highlights the site's existing blue-green infrastructure and recommends that development be carefully planned to retain key features, maintain the buffer to the SSSI, and achieve a low-density, wildlife-friendly form of development. The Town Council raises concerns regarding highway access and cumulative impacts, emphasising the need for careful design and wider infrastructure considerations. It also recommends that development should contribute towards locally identified

	infrastructure improvements, including enhanced pedestrian links to Bat & Ball Station and improved access to the Nature Reserve, informed by the Neighbourhood Plan and Highway Improvement Plan.
Other Consultation Bodies	<u>The Woodland Trust</u> Ancient semi-natural woodland lies adjacent to the northern boundary of the site, and it is recommended that site boundaries are amended to exclude this area from development. A precautionary buffer of at least 50 metres should be maintained between development and the woodland, with any reduction requiring clear justification; larger buffers may be necessary where disturbance is greater. Buffer zones should remain free of built development and private gardens, although they may form part of accessible green space. It is also recommended that further survey work is undertaken to update the Ancient Tree Inventory and identify any additional ancient or veteran trees on or near the site.
General Response	Respondents note that adding new homes and jobs in this location could worsen congestion on Otford Road and at the nearby Bat and Ball junction, straining parking, pedestrian safety and emergency response capacity, and highlight that current transport modelling fails to cover cumulative impacts from nearby proposed developments. Concerns include increased air and noise pollution and risks to ancient woodland, wildlife reserves and SSSI buffers, prompting calls for biodiversity net gain, buffer zones and ecological assessments. Flood risk from run-off and threats to a rare chalk stream are also highlighted. Requests include ground contamination, mineral safeguarding, flood studies, viability appraisals and upgrades to nearby junctions, pedestrian links and access to the Wildlife Reserve.
Key issues raised	Local services, parking and community infrastructure capacity Transport network capacity and cumulative traffic impacts Highway access and junction safety Air quality and noise impact Ecology, biodiversity net gain and protected site buffers Land designation, policy compliance and viability Flood risk, hydrology and chalk stream protection Contamination, ground conditions and mineral safeguarding

SITE PROMOTER RESPONSE

Rapleys

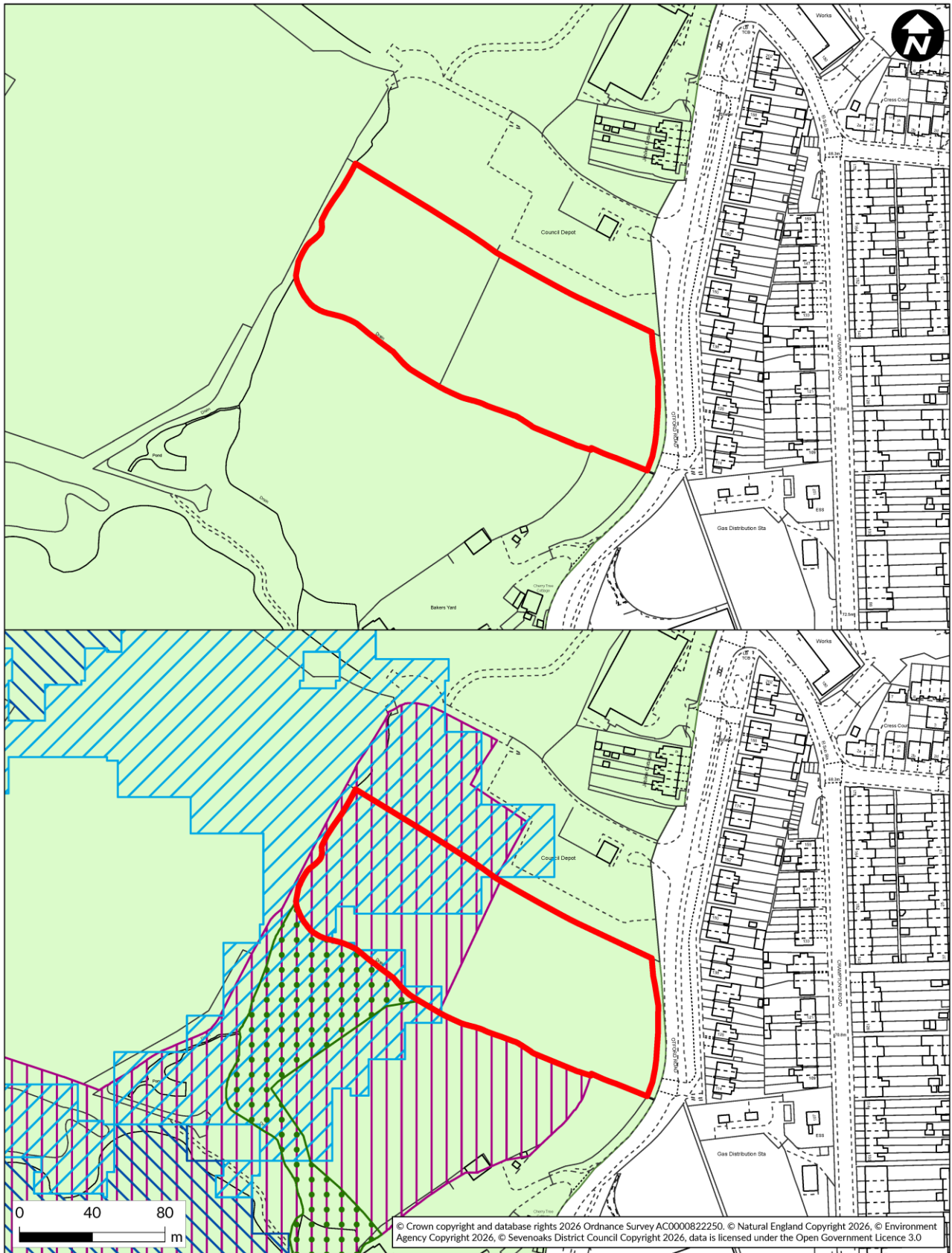
The site promoter supports the allocation of Bakers Yard for a mixed-use development comprising approximately 50 residential units alongside employment uses, confirming the site is available, deliverable within Years 1–5, and in a highly sustainable location close to Sevenoaks town and public transport. The promoter agrees with the 2025 SHELAA assessment that the site constitutes grey belt land and is suitable for development and considers that it can contribute towards meeting identified housing and employment needs. They indicate that all technical matters, including impacts on the adjacent SSSI, flood risk, contamination, noise and air quality, can be appropriately addressed through further assessment and mitigation at the planning application stage, and express a willingness to contribute to infrastructure and policy requirements, subject to viability.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a partially brownfield site adjacent to the urban confines of Sevenoaks Urban Area, which is identified as the District's principal town in the Settlement Hierarchy 2025. The site is therefore considered to be in a highly sustainable location, close to existing key services and facilities, including being within close proximity to Bat and Ball Station. The site lies fully within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site does not lie within National Landscapes. Should a scheme come forwards on this site, it would require consultation regarding the SSSI impact zone, as well as contaminated land, noise and air quality assessment. The site does lie majority within a Mineral Safeguarding Area which would require further consideration. The southern element of the site, along Otford Road, is covered by Tree Preservation Orders (TPOs) and therefore this element of the site is considered unsuitable. Accordingly, the wider site boundary is considered unsuitable for development, although a revised site boundary has been considered in the SHELAA for employment use.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The wider site boundary is considered unsuitable for development due to the presence of Tree Preservation Orders (TPOs) on the southern portion of the site.

MX/21/00024
Land South of Former Park and Ride



SITE DETAILS	
SHELAA Reference	MX/21/00024
Site Area (Ha)	1.59
Developable Area (Ha)	0.84
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	MX20
Site Description	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area. The site comprises a rectangular piece of land containing grassland in the east and woodland in the west. The site is bound by Otford Road to the east, a depot to the north, woodland to the south and open countryside to the west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (adjacent to Sevenoaks)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	Yes (Open Spaces 2018 24: Sevenoaks Wildfowl Reserve, Sevenoaks Natural & Semi Natural 47.36%)	
Green Belt	Within Green Belt (but adjacent to Urban Confines of Sevenoaks)	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Low - Medium, Commercial Sensitivity: Low - Medium	
Agricultural Land Quality	Urban - 5.54%; Grade 4 - 94.46%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Partially within a SSSI 47.36%	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	9.89% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Within 100m of 1 locally listed assets	
Contamination Issues	Contaminated Land Assessment (former land use)	
Noise Pollution	Noise Assessment (commercial and highway)	
Air Quality	Air Quality Assessment (for site and impact on local AQMA)	
Mineral Safeguarding Area	Partially within Mineral Safeguarding Area 30.71%	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	100.0% within 400m of Sevenoaks	
Town and Local Centres	Within 800m of St Johns (walkable in 10 minutes)	

Train Station	Within 800m of Bat and Ball Station (walkable in 10 minutes)	
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GREEN	AMBER	RED
13	11	2

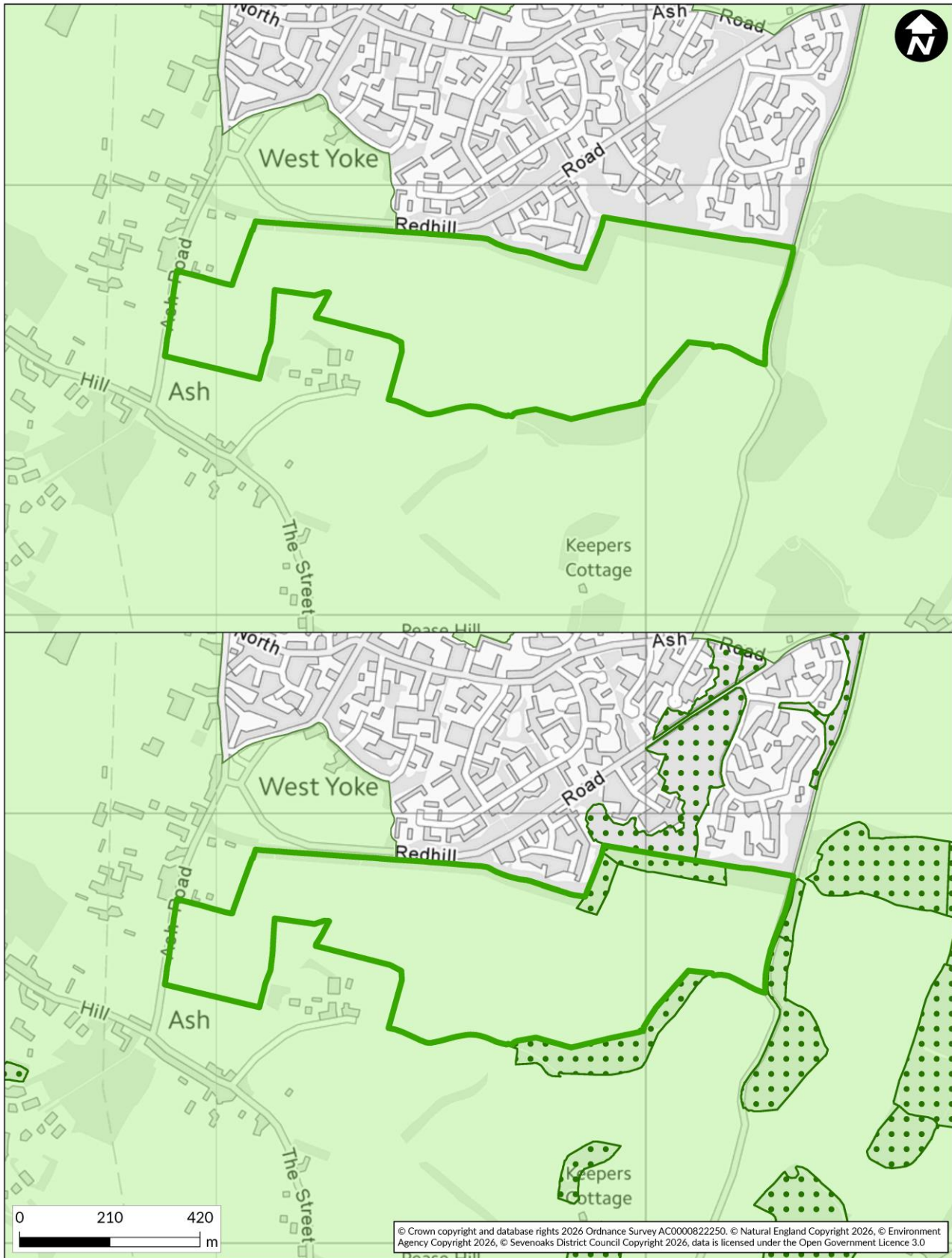
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area, which is identified as the District's principal town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, including access to Bat and Ball Train Station. The site is within the Green Belt but is considered to be grey belt under national policy. The site also lies within an area of designated open space (Sevenoaks Wildfowl Reserve, Sevenoaks Natural and Semi Natural). Due to the constrained nature of the site by an open space designation, it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is constrained an area of designated open space. Therefore, the site is not proposed for allocation.

MX/21/00041
Land South of Redhill Road, New Ash Green



SITE DETAILS	
SHELAA Reference	MX/21/00041/B
Regulation 19 Reference	ST4-26
Regulation 18 2025 Reference	Part of NAG9
Site Area (Ha)	47.1
Developable Area (Ha)	45.33
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	MX4, MX61
Site Description	This is a greenfield site adjacent to the urban confines of New Ash Green. The site comprises a large parcel of land containing agricultural fields used for arable crop production. The site is bound by residential development to the north and west and open countryside to the south and east.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	530 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to urban confines of New Ash Green
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (Adjacent to New Ash Green)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt (but adjacent to Urban Confines of New Ash Green)	
Green Belt Stage 3	Grey belt	
National Landscape	Not within National Landscape	
Landscape Sensitivity	Medium, Commercial Sensitivity: Medium – High	
Agricultural Land Quality	Urban - 2.45%; Other - 32.16%; Grade 3 - 65.39%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Partially within Ancient Woodland 3.76%	
Presence of Heritage Assets	Within 200m of 8 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	Noise Assessment (commercial)	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	No capacity on transport network	
Settlement Classification	61.72% within 250m of New Ash Green	
Town and Local Centres	(walkable and cycle friendly)	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
14.5	8.5	3

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England noted that the site lies within the setting of the Kent Downs National Landscape and expressed concern that NAG9, a large greenfield allocation for approximately 580 homes, would significantly extend the existing settlement boundary. Their response directed the Council to established guidance on allocating sites within National Landscape settings and emphasised the importance of ensuring the allocation is fully informed by this advice. The response also highlighted that NAG9 contains ancient woodland to the north, with further ancient woodland directly adjoining the southern and eastern boundaries. As ancient woodland is an irreplaceable habitat, it is stated that the allocation must have regard to paragraph 193(c) of the NPPF and Policy BW2 to prevent any loss or damage to these habitats. They noted that Green Infrastructure provision within the scheme presents an opportunity to improve connectivity between ancient woodland blocks across the wider landscape. In addition, the response identified that a Public Right of Way crosses the site. It is advised that the allocation should comply with paragraph 105 of the NPPF and Policy T2 of the Local Plan to protect and enhance this PRow and maintain strong links to the wider network.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Ash-cum-Ridley Parish Council</u> A response from Ash-cum-Ridley Parish Council concluded that the site is not deliverable, not sustainable and therefore not justified for allocation. They noted that this site had previously been discounted at an earlier Regulation 18 consultation, citing concerns about its scale, Green Belt location and, critically, its lack of deliverable access. The response explained that Kent Highways had required a second access in addition to the proposed Ash Road access, but none of the surrounding roads were considered suitable. Hartley Bottom and Church Road were described as narrow single-carriageway lanes with no passing places, while The Street in Ash was deemed unsafe due to its alignment, proximity to the Billet Hill junction and limited visibility. It is highlighted that the only potentially suitable

	second access would be via Redhill Road, but this is constrained by a wide belt of trees in third-party ownership, and the landowner is known to oppose the development, rendering access unobtainable. The respondent also emphasised that a development of 580 homes would rely heavily on private car travel, given limited public transport, existing congestion on Ash Road and the absence of realistic opportunities to enhance sustainable transport. Referencing national policy, the response argued that New Ash Green cannot be made sustainably connected in line with NPPF requirements.
Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP noted that NAG9, the largest allocation at 580 homes, has raised significant concern among residents regarding sustainability, access, landscape and heritage. It is emphasised that full development would physically merge New Ash Green and Ash, which they argued would harm the identity of both villages. The response also highlighted longstanding road capacity issues, stressing that development should only proceed if improved connections, particularly towards the A20, can be secured. Finally, it also referred to New Ash Green's unique governance structure and stated that any new development must integrate with the Village Association, requesting clarity on how this would be secured through the Local Plan. <u>The Woodland Trust</u> A response from The Woodland Trust strongly disagreed with the site proposal, noting that an area of Ancient Semi-Natural Woodland lies within the northern boundary of the allocation, with further ancient woodland adjoining the southern and eastern edges, including White Ash Wood and Springcroft Wood. The response recommended that site boundaries be redrawn to exclude ancient woodland and that a minimum 50-metre buffer be secured, free from built development or private gardens. It is also advised that a detailed expert survey be required to complete the Ancient Tree Inventory, as current records may be incomplete, ensuring that ancient, veteran and notable trees are properly identified and protected.
General Response	Respondents noted significant strain on existing water, sewage and utility infrastructure, and highlighted that the narrow country lanes surrounding the site would be unable to accommodate increased traffic or provide safe passage for emergency vehicles. It is also pointed out that infrequent bus

	services, limited cycle routes and full station car parks could lead to greater reliance on private cars. Social infrastructure pressures were emphasised, with local GP surgeries and schools already operating at capacity. Several technical constraints were identified, including flood risk, groundwater protection zones, the presence of a high-pressure gas main and heavy clay soils. Environmental concerns, such as potential loss of ancient woodland and wildlife habitats, harm to heritage assets and further erosion of Green Belt gaps, were also raised. Additionally, respondents cited uncertainties around funding and the timing of necessary infrastructure upgrades, as well as gaps in consultation details, as factors that could undermine the site's overall deliverability.
Key issues raised	Local services, utilities and public infrastructure capacity Highway access and local road capacity Site deliverability, technical constraints and construction impacts Green Belt, landscape, settlement separation and character Public transport and sustainable travel connectivity Ecology, ancient woodland and biodiversity Heritage, archaeology and historic setting Flood risk, drainage and groundwater protection

SITE PROMOTER RESPONSE

Stantec on behalf of Berkeley Strategic Land Ltd

A response from Stantec, on behalf of the site promoter - Berkeley Strategic Land Ltd, expressed support for the proposed allocation of NAG9 and confirmed that the site is available, achievable and suitable for residential-led development. The respondent highlighted Berkeley's experience in delivering high-quality housing and endorsed the Council's identification of the land as 'Grey Belt'. The response outlined the benefits of the scheme, including around 580 homes, 50% affordable homes, community facilities, green infrastructure and potential bus service enhancements. While supporting the Council's proactive spatial strategy, the respondent requested greater clarity on housing supply, viability evidence and policy effectiveness, and sought continued engagement ahead of Regulation 19.

A response from Berkeley Strategic Land Ltd also confirms that the site continues to be actively promoted. It confirmed agreement with the SHELAA's site boundary of 47.1 hectares and the assessed developable area of 45.33 hectares, noting that this reflects all proposed land uses and correctly excludes ancient woodland. The respondent supported the proposed residential and community uses and agreed with the site capacity of 580 homes. While accepting the 1-5-year availability window, the response did not consider a 2025 start date achievable and outlined a more realistic programme.

- Submission of planning application – late 2026
- Consent – mid/late 2027
- Commencement on site – 2028
- First completions – 2029

The response broadly agreed with the Council's assessment and maintained that the site is in a sustainable location. It highlighted targeted improvements set out in the 2025 Mobility Strategy, including upgraded cycle routes, active-travel contributions and enhancements to the 489 and C3 bus services, which they argued would significantly improve access to Longfield Station and challenge the current red rating. The response also stated the site would meet NPPF grey-belt requirements through 50% affordable housing, community infrastructure, and extensive green infrastructure. It acknowledged nearby listed buildings and ancient woodland but noted that sensitive design and appropriate buffer zones would ensure no strong reason for restricting development. Overall, the response agreed that the site qualifies as Grey Belt.

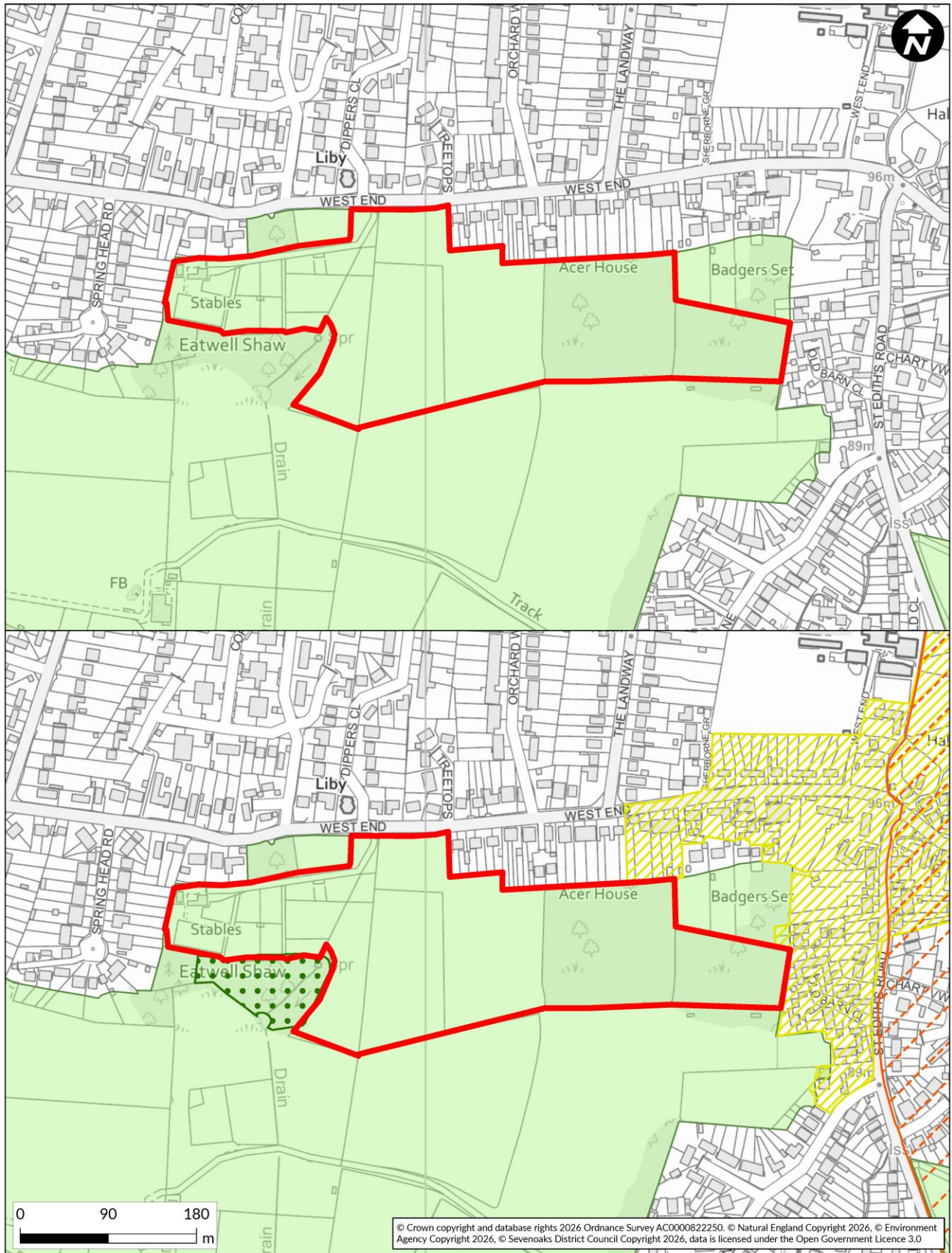
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of New Ash Green, which is identified as a Primary Service Settlement in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, although it is noted that the site does not benefit from access to a nearby train station. The site lies fully within the Green Belt but is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site does not lie within national landscapes. Scheme design should take into account the adjacent heritage assets, ancient woodland and landscape sensitivity, and road access/network capacity will need further consideration to promote public transport use, walking and cycling. There are no other constraints that would make this site unsuitable. However, Regulation 18 comments highlighted the importance of the Strategic Gap between New Ash Green and Ash, as well as the Grade 1 Listed Church at St Peters and St Pauls. Accordingly, the boundary for this site has been redrawn and this wider site boundary is considered to be unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
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	Do not include in Plan
SDC Comments	The wider site is considered unsuitable for allocation due to the strategic gap between New Ash Green and Ash, as well as harm and proximity to the Grade 1 Listed Church at St Peter and St Pauls.

MX/21/00046
Land at West End, Kemsing



SITE DETAILS	
SHELAA Reference	MX/21/00046
Regulation 18 2025 Reference	KEM5
Site Area (Ha)	7.76
Developable Area (Ha)	7.73
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO126 / HO130 / HO133
Site Description	This is a greenfield site adjacent to the urban confines of Kemsing. The site comprises a large area of open countryside and agricultural use. The site is bound by West End and residential development to the north, residential to the east and west and open countryside to the south. The site currently has one access off West End.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to urban confines of Kemsing
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent Kemsing	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt (adjacent to Kemsing)	
Green Belt Stage 3	Grey belt	
National Landscapes	0.15% within 100m buffer of Kent Downs	
Landscape Sensitivity	Medium	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	0.3% within Ancient & Semi-Ancient Woodland	
Presence of Heritage Assets	Within 200m of Kemsing Conservation Area and 13 Listed Buildings	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not within Mineral Safeguarding Area	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Adjacent to Kemsing	
Town and Local Centres	Within 2km of Kemsing, The Parade	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
17	7	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site falls within the setting of the Kent Downs National Landscape, abuts ancient woodland, which is an irreplaceable habitat, to the south west of the site and also abuts Priority Habitats Inventory – Deciduous Woodland to the southwest.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Kemsing Parish Council</u> A response from Kemsing Parish Council disagrees with the proposed site allocation, citing Green Belt classification, landscape sensitivity, openness of the Green Belt, cumulative impact of development on surrounding infrastructure including highways, healthcare and education.
Other Consultation Bodies	<u>Kent Downs National Landscapes</u> A response from Kent Downs National Landscape unit highlights that the site lies within the setting of the National Landscape and cites the Landscape Sensitivity Assessment regarding the intervisibility with the North Downs. <u>The Woodland Trust</u> A response from The Woodland Trust highlights that the site is adjacent to Ancient and Semi-Natural Woodland to the south west boundary of the site and recommends redrawing the site boundary to account for this. <u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns regarding Green Belt classification, the Kent Downs National Landscape and the North Downs, the Kemsing Conservation Area, the surrounding highways network and the cumulative impact on the surrounding infrastructure.
General Response	Respondents raise concerns about how the local road network would cope with additional development. They note that existing rural lanes already have limited capacity, and further traffic could increase risks for pedestrians and make access more difficult for

	emergency services. Construction HGVs are also considered unsuitable for these routes. Community and utility infrastructure are constrained. Local education, primary-care and wastewater services are said to have limited room or funding to expand, while public transport and station access are viewed as insufficient to meet current or future needs. This, in turn, is felt to contribute to car dependency and additional on-street parking pressures. Environmental and landscape impacts are another key theme. Respondents highlight potential effects on heritage assets, the Kent Downs National Landscape, ancient woodlands, chalk streams and protected species. There are also concerns that flood risk and water supply issues could worsen without SuDS measures or upgrades to existing networks. Finally, some respondents express unease about the policy context, suggesting that changes could weaken Green Belt protections if mitigation measures and community benefits are not demonstrably deliverable.
Key issues raised	Highway capacity and road safety Education and primary care capacity Public transport and station access Heritage, AONB and landscape setting Biodiversity, trees and woodland Water, wastewater and flood risk Construction logistics and HGV routing On-street parking and village centre amenity

SITE PROMOTER RESPONSE

DHA Planning on behalf of Fernham Homes Operations Ltd

A response from DHA Planning on behalf of Fernham Homes Operations Ltd, as site promoter, confirms support for the inclusion of the site within the Local Plan and reaffirms availability and deliverability of the site within the Local Plan period. Notwithstanding this, the response also raises wider concerns and comment round the emerging Development Strategy and emerging policies within the Local Plan.

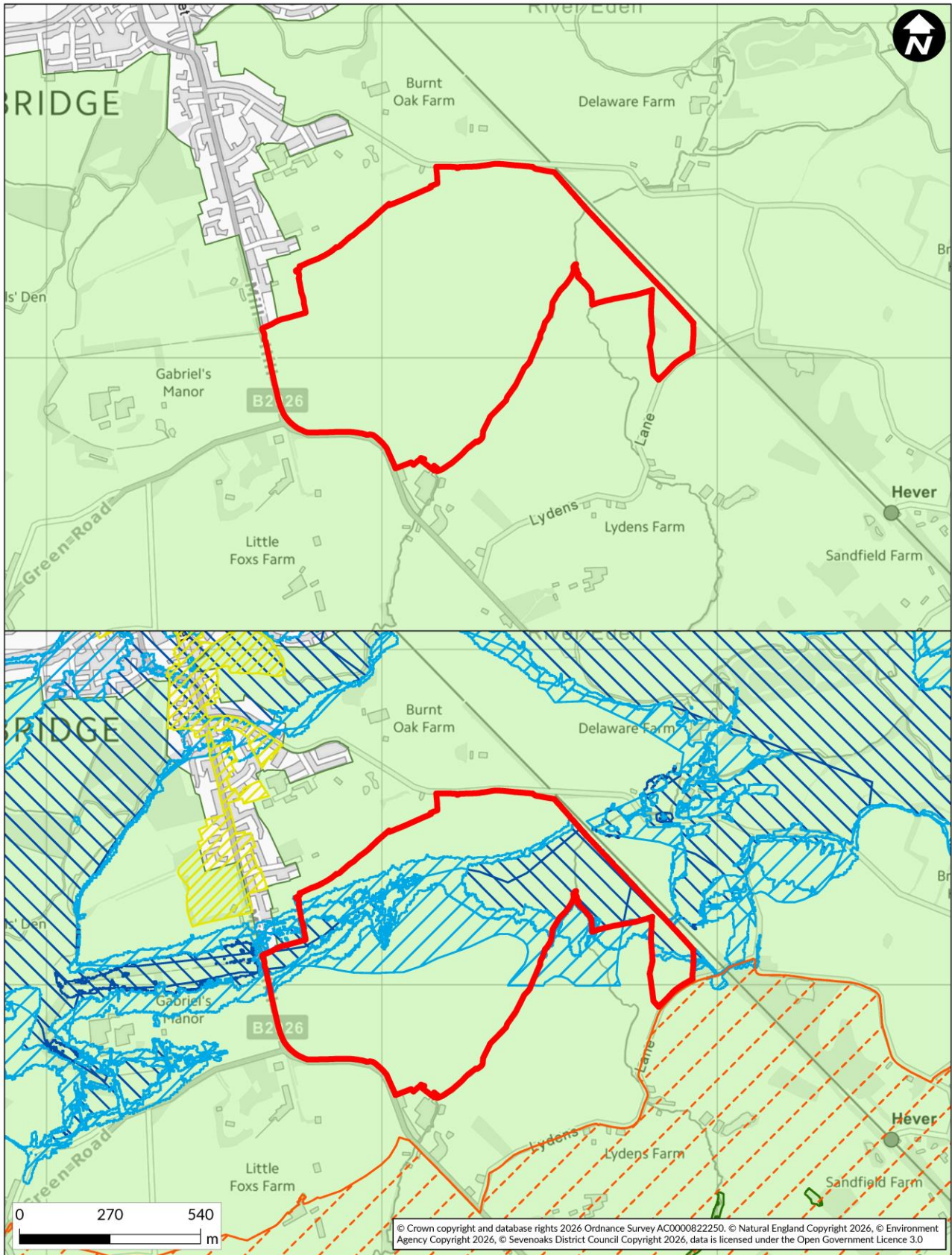
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Kemsing, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. The site is
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	therefore considered to be in sustainable location, close to key services and facilities in Kemsing, including the allocated Local Centre at The Parade. It is noted that the site lies over 2km from a train station. The site lies fully within the Green Belt but is considered to be grey belt land under national policy due to its performance against Green Belt purposes A, B and D. The site does not lie within national landscapes. The site is medium landscape sensitivity, and lies within 200m of Kemsing Conservation Area, which has been further assessed and is considered to have an unacceptable impact on the setting of the Conservation Area. Accordingly, the site is considered to be unsuitable for residential development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to the resultant impact on the setting of Kemsing Conservation Area.

MX/21/00048
Land between Hartfield Road and Hever Road, Edenbridge



SITE DETAILS	
SHELAA Reference	MX/21/00048
Site Area (Ha)	62.51
Developable Area (Ha)	62.51
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO60, HO412, MX62
Site Description	This is a greenfield site to the south of the urban confines of Edenbridge. The site comprises a large parcel of agricultural land. The site is bound by the railway line to the east and Hever Road, Mill Hill and Hartfield Road to the west. The north and south of the site are bound by open countryside.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within Urban Confines (adjacent to Edenbridge)	
Land Use (GF/PDL)	Greenfield	
Existing use	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt (but adjacent to Urban Confines of Edenbridge)	
Green Belt Stage 3	Grey belt	
National Landscapes	2.15% within 100m buffer of High Weald National Landscapes	
Landscape Sensitivity	Medium 95.5%	
Agricultural Land Quality	Urban - 0.47%; Grade 3 - 99.53%	
Flood Risk	Partially in Flood Zone 2	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	3.43% within 200m of Edenbridge conservation area; Within 200m of 7 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	Noise Assessment (commercial and rail)	
Air Quality	No specific risk	
Mineral Safeguarding Area	Partially within Mineral Safeguarding Area (37.12%)	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	39.79% within 400m of Edenbridge	
Town and Local Centres	800m-2km to Town and Local Centre (walkable and cycle friendly) within 2km of Edenbridge, Central Area	

Train Station	800m-2km to nearest train station (walkable and cycle friendly) Within 2km of Edenbridge Town Station	
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GREEN	AMBER	RED
11	13	2

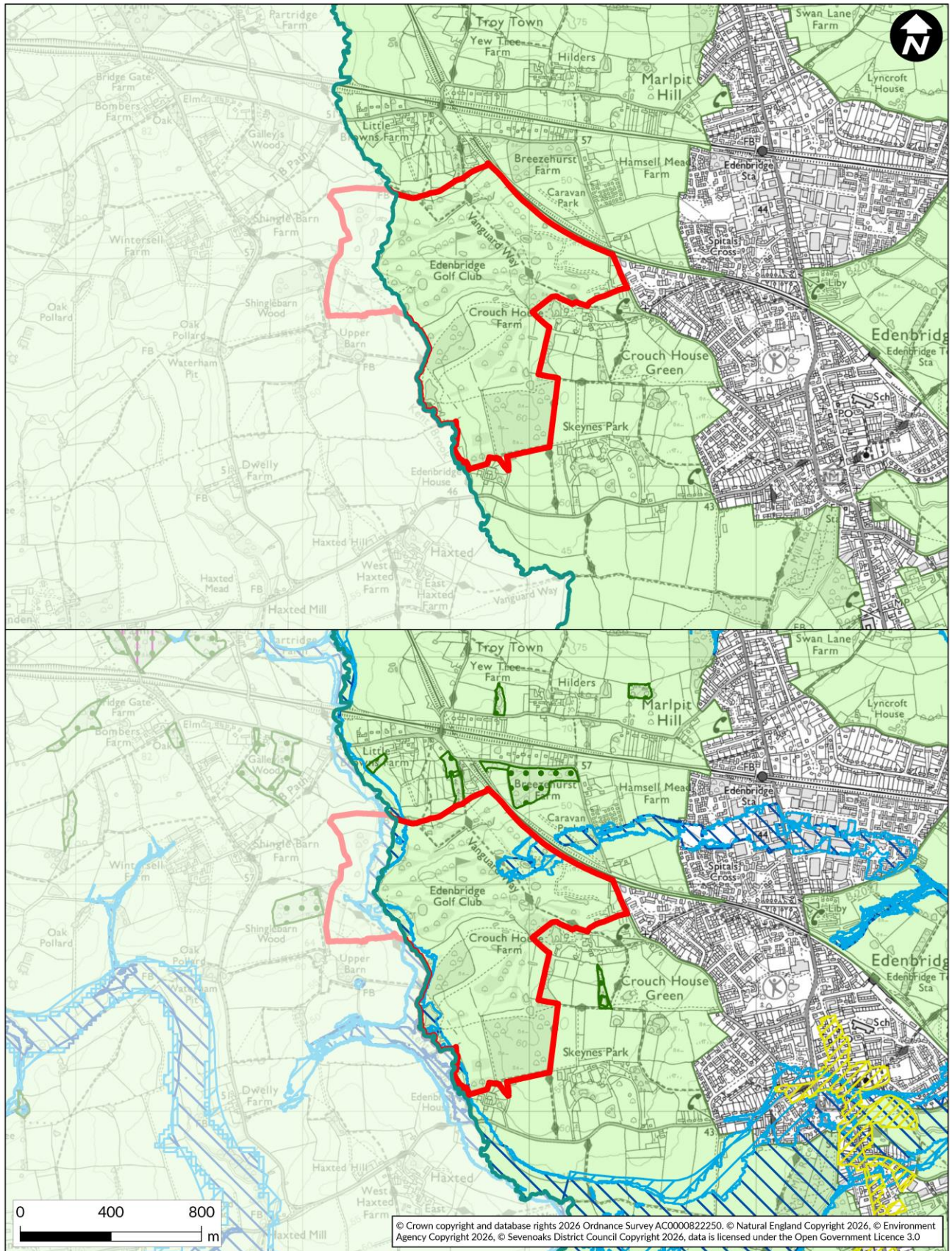
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, including access to two train stations in Edenbridge. The site lies fully within the Green Belt and is considered to be grey belt land under national policy due to its performance against Green Belt purposes A, B and D. However, the site would present an unnatural extension to the urban confines of Edenbridge and therefore it is considered to be unsuitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered to present an unnatural extension to the Edenbridge urban confines boundary and therefore this site is considered to be unsuitable for development.

MX/24/00001
Kent and Surrey Golf Course, Edenbridge (wider site)



SITE DETAILS	
SHELAA Reference	MX/24/00001
Site Area (Ha)	92.41
Developable Area (Ha)	92.41
Brownfield / Greenfield	Mixed
Planning History	19/02834/OUT
Previous SHELAA Ref (2018)	HO331 forms part of this site
Site Description	This is a greenfield Green Belt site, which comprises a former golf course, where a small element of the site is adjacent to the urban confines of Edenbridge. The site is bound by the railway line to the north, Crouch House Road and residential development to the east. The remainder of the site is surrounded by open countryside and agricultural land. The western portion of the site lies within the Tandridge District Council area, although it is noted that the element of the site proposed for development is within the SDC boundary.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Edenbridge	
Land Use (GF/PDL)	Mixed	
Existing use	Yes (although not allocated)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Edenbridge	
Green Belt Stage 3	Grey belt	
National Landscape (AONB)	Not within National Landscape	
Landscape Sensitivity	Medium-High (83.89%)	
Agricultural Land Quality	Grade 3 – 80.93%	
Flood Risk	10.79% in Flood Zone 2, 7.08% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	0.15% within Ancient Woodland 15m buffer	
Presence of Heritage Assets	Within 200m of 3 listed buildings	
Contamination Issues	Contaminated land assessment – if subject to previous soil importation	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	5.65% within Sub Alluvial River Terrace	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Limited capacity on transport network – may require improvements	
Settlement Classification	Within 400m of Edenbridge	
Town and Local Centres	Within 2km of Edenbridge, Central Area, Edenbridge Northern Fringe, Edenbridge Southern Fringe	
Train Station	Within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
13	12	1

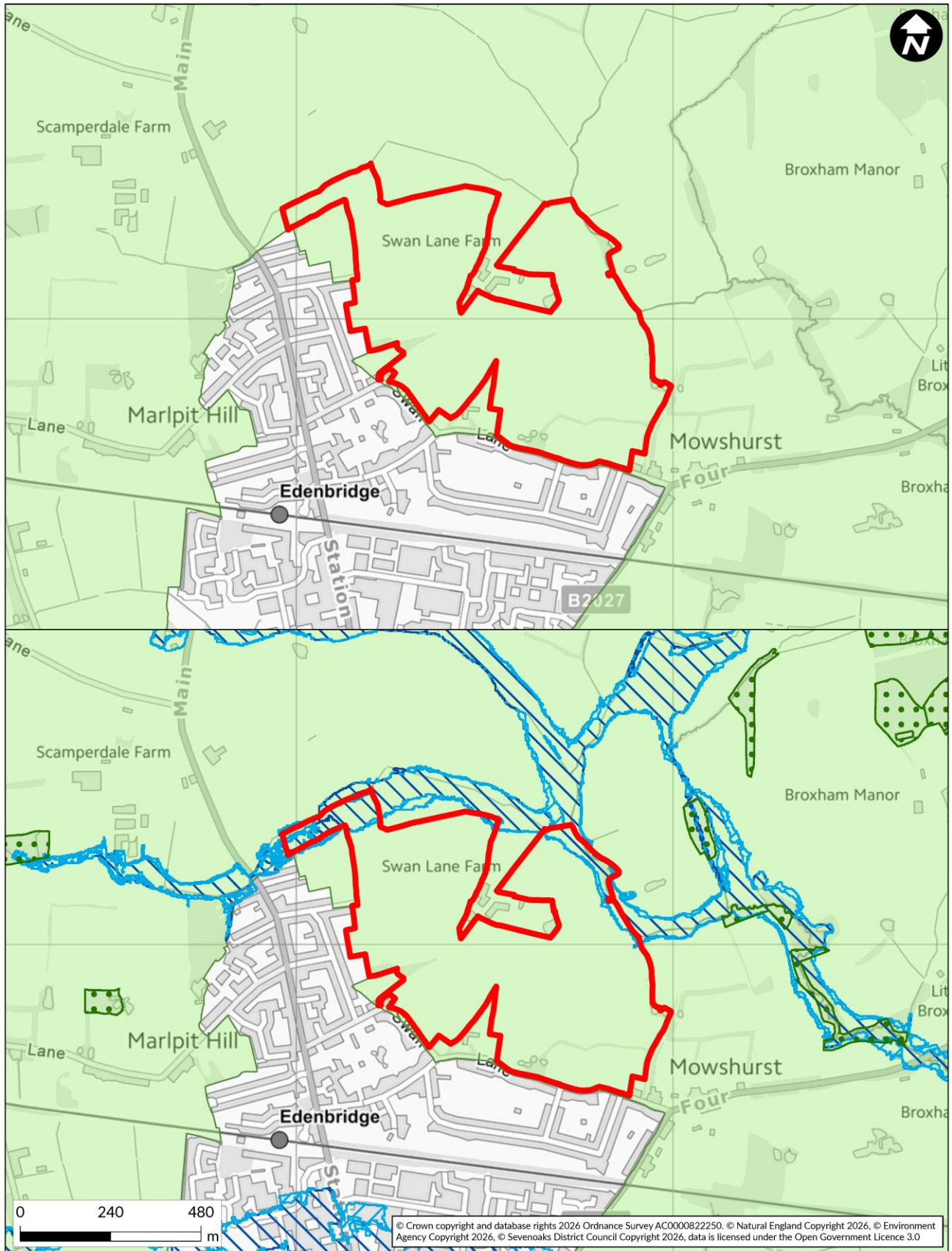
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt site situated adjacent to the urban confines of Edenbridge, which is identified as a Town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing services and facilities, although it is highlighted that given the size of this site, the western portion of the site is further away from these facilities and therefore considered to be less sustainable. The site lies fully within the Green Belt and the majority of the site is Medium-High landscape sensitivity. Primarily due to the landscape constraints, and the location of the site, with the majority of the site not adjacent to the settlement (which would leave a 'gap' in the Green Belt) it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site would present an unnatural extension to the urban confines of Edenbridge and therefore is not considered suitable for development.

MX/24/00002
Land at Swan Lane, Edenbridge (wider site)



SITE DETAILS	
SHELAA Reference	MX/24/00002
Regulation 18 2025 Reference	EDEN16
Site Area (Ha)	41.9
Developable Area (Ha)	41.9
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO279
Site Description	This is a greenfield Green Belt site adjacent to the urban confines of Edenbridge. The site comprises a large parcel of land to the north-east of Edenbridge used for grazing, incorporates a couple of agricultural buildings at Swan Lane Farm. The site is bound by residential development to the south and west, and agricultural land to the north and east. This site forms the same parcel of land as was submitted under HO/21/00190, with a small number of slight boundary adjustments
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Edenbridge	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscape	
Landscape Sensitivity	Medium - High - 100%	
Agricultural Land Quality	Grade 3 – 72.53%	
Flood Risk	15.01% in Flood Zone 2 and 3.35% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	Requires consultation	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	2.75% within Sub Alluvial River Terrace	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network – may require improvements	
Settlement Classification	Within 400m of Edenbridge	
Town and Local Centres	Within 2km of Edenbridge Central Area and Edenbridge Northern Fringe	
Train Station	Within 800m of Edenbridge, within 2km of Edenbridge Town	

GREEN	AMBER	RED
13	11	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that the site falls within the setting of the Kent Downs National Landscape and that the scale of the site would extend the existing settlement boundary and potentially result in a changed landscape character. In addition, the response highlights that the site contains Priority Habitats Inventory – Deciduous Woodland at the eastern boundary and also a Public Right of Way.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Edenbridge Town Council</u> A response from Edenbridge Town Council objects to the proposed allocation, citing concerns regarding high-performing Green Belt, a lack of a clear, defensible outer boundary, intrusion into open countryside, poor location for amenities and the town centre, unsuitable and unsafe access, contrary to national planning policy, flood risk, density, lack of clarity on mixed uses and deliverability, risks creating landlocked parcels and the cumulative impact on infrastructure including the surrounding rural road network. <u>Westerham Town Council</u> A response from Westerham Town Council disagrees with the proposed site allocation, highlighting concern for the scale of development proposed for Edenbridge, transport infrastructure and the surrounding road network, infrastructure capacity, density and scale and harm to Green Belt.
Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP highlights the importance of additional facilities from the site, the surrounding road network and traffic concerns as well as the height restricted railway bridges separating the site from the town centre. <u>CPRE Kent</u> A response from CPRE Kent strongly objects to the proposed site allocation, highlighting the bordering public rights of way,

	landscape sensitivity, impact on SSSI and strongly performing Green Belt as key concerns.
General Response	Respondents report that the proposed development at EDEN16 would overload narrow rural roads and railway bridges, drive greater reliance on private cars and worsen congestion. They warn it would weaken Green Belt boundaries by extending beyond Swan Lane and strain schools, healthcare and emergency services that already operate at capacity. Concerns include harm to landscapes, heritage assets and public rights of way, increased flood risk on waterlogged clay without a site-specific drainage strategy, and a lack of coherent masterplanning, infrastructure phasing and secured funding for highways, utilities and community facilities. Respondents note that biodiversity corridors may be threatened and required net gains could be unachievable. They highlight that existing sewage and water supply networks would be overwhelmed and that poor digital connectivity and procedural gaps in the consultation process remain unaddressed.
Key issues raised	Highways, access and public transport Green Belt status, boundary change and settlement form Community infrastructure and services Landscape, heritage and public rights of way Flood risk and surface water management Deliverability, masterplanning and infrastructure phasing Biodiversity, protected species and biodiversity net gain Sewage, wastewater and water supply

SITE PROMOTER RESPONSE

DHA Planning on behalf of BDW Homes

A response from DHA Planning on behalf of BDW Homes, as the site promoter, confirms support for the sites inclusion in the Regulation 18 plan and reaffirms site availability and deliverability within the Plan period. The response provides further site details on the site specific proposals as well as providing wider commentary on the emerging Local Plan policies and proposed Development Strategy.

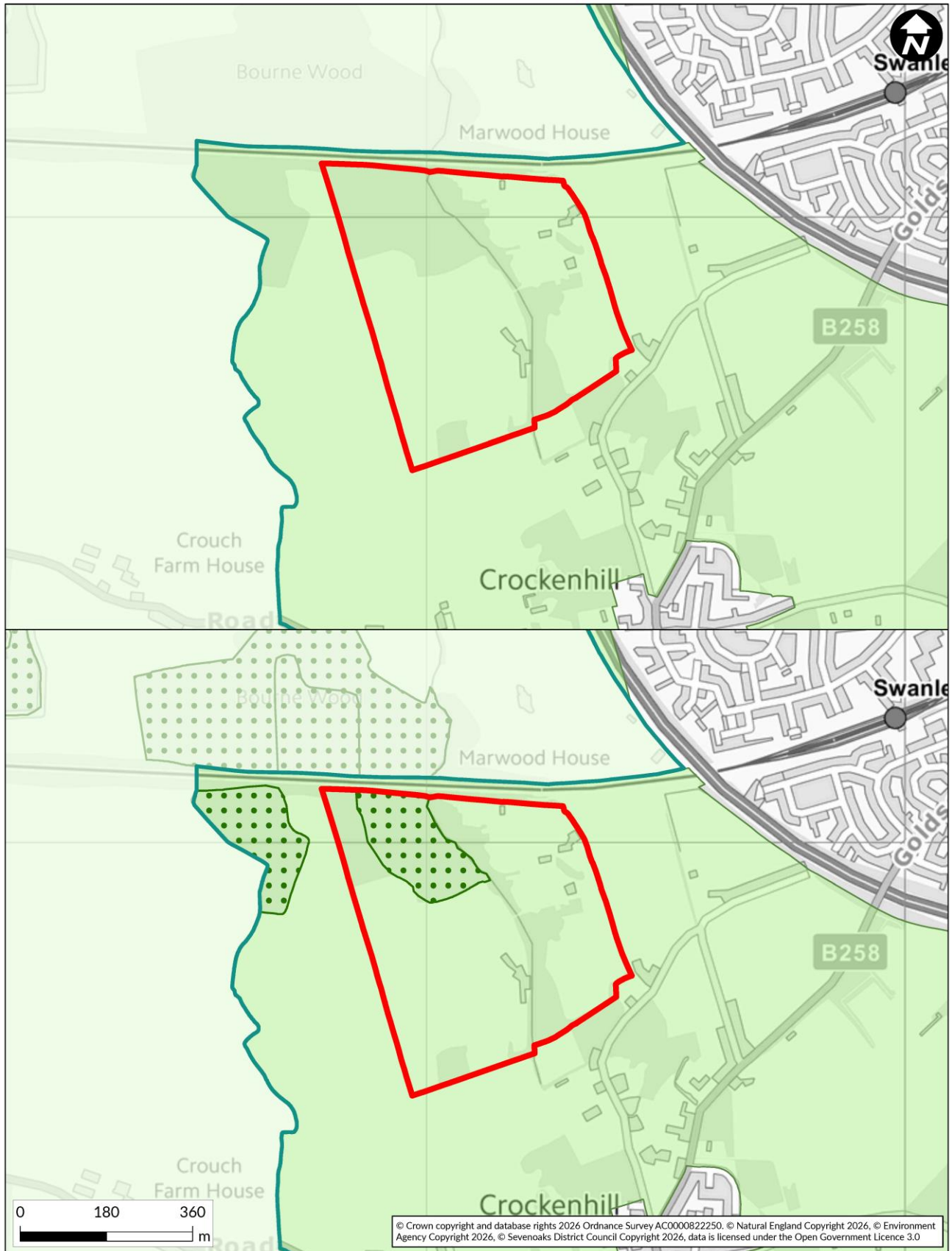
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement
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	Hierarchy 2025. The site is therefore considered to be in a relatively sustainable location. The site is within the Green Belt but is considered to constitute provisional grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The site does not lie within national landscapes but is in an area of medium-high landscape sensitivity, adjacent to heritage assets and a small area to the north of the site falls within flood zones. A contaminated land assessment would be required for a scheme on this site, as well as new access and there is limited capacity on the surrounding transport network.
Availability	The site has been submitted by the landowner and is considered to be available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is located adjacent to Edenbridge and constitutes provisional grey belt land. However, due to the distance from services and facilities in Edenbridge, this site is considered relatively less sustainable than other sites promoted adjacent to Edenbridge. It would also promote an unnatural extension to the settlement. Due to the cumulative level of growth proposed for Edenbridge, and the constraints of this site, it is not considered suitable for inclusion in the Local Plan.

MX/25/00004
Land at Bournewood Brickworks, off Stone Cross Road, Crockenhill



SITE DETAILS	
SHELAA Reference	MX/25/00004
Site Area (Ha)	27.17
Developable Area (Ha)	20.28
Brownfield / Greenfield	Mixed
Planning History	N/a
Previous SHELAA Ref (2018)	N/a
Site Description	Site located to the north of the village of Crockenhill and to the south-west of the town of Swanley, outside of the urban confines of either settlement. Site access off Stones Cross Road. Site bounded by railway line to the north, agricultural/farmland to the south, east and west. Land previously in use as a brickworks, now occupied by a variety of permanent and temporary structures, residential, fields and woodland (Tile Kilns Wood LWS)
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of Swanley urban confines
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	In Green Belt, 240m from Swanley	
Land Use (GF/PDL)	Mixed	
Existing use	C3, B8 and Sui Generis (from applicant)	
Existing allocation / designation	Town and Local Centre: Brasted High Street and The Green (6.65%)	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscape	
Landscape Sensitivity	Within SW3 Swanley south Residential Sensitivity: Medium, Commercial Sensitivity: Medium	
Agricultural Land Quality	Other 32% Grade 2 68%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	25.28% within Hook Spring and Tile Kilns Wood	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	13% within Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	Contaminated land assessment – former use	
Noise Pollution	Noise assessment – adjacent to railway	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not in the vicinity of any mineral safeguarding area	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	17.29% within 400m of Swanley	
Town and Local Centres	Within 800m of Crockenhill, Broadway; 2km of Swanley - Town Centre	
Train Station	within 2km of Swanley train station	

GREEN	AMBER	RED
12	12	2

SHELAA 2026 ASSESSMENT

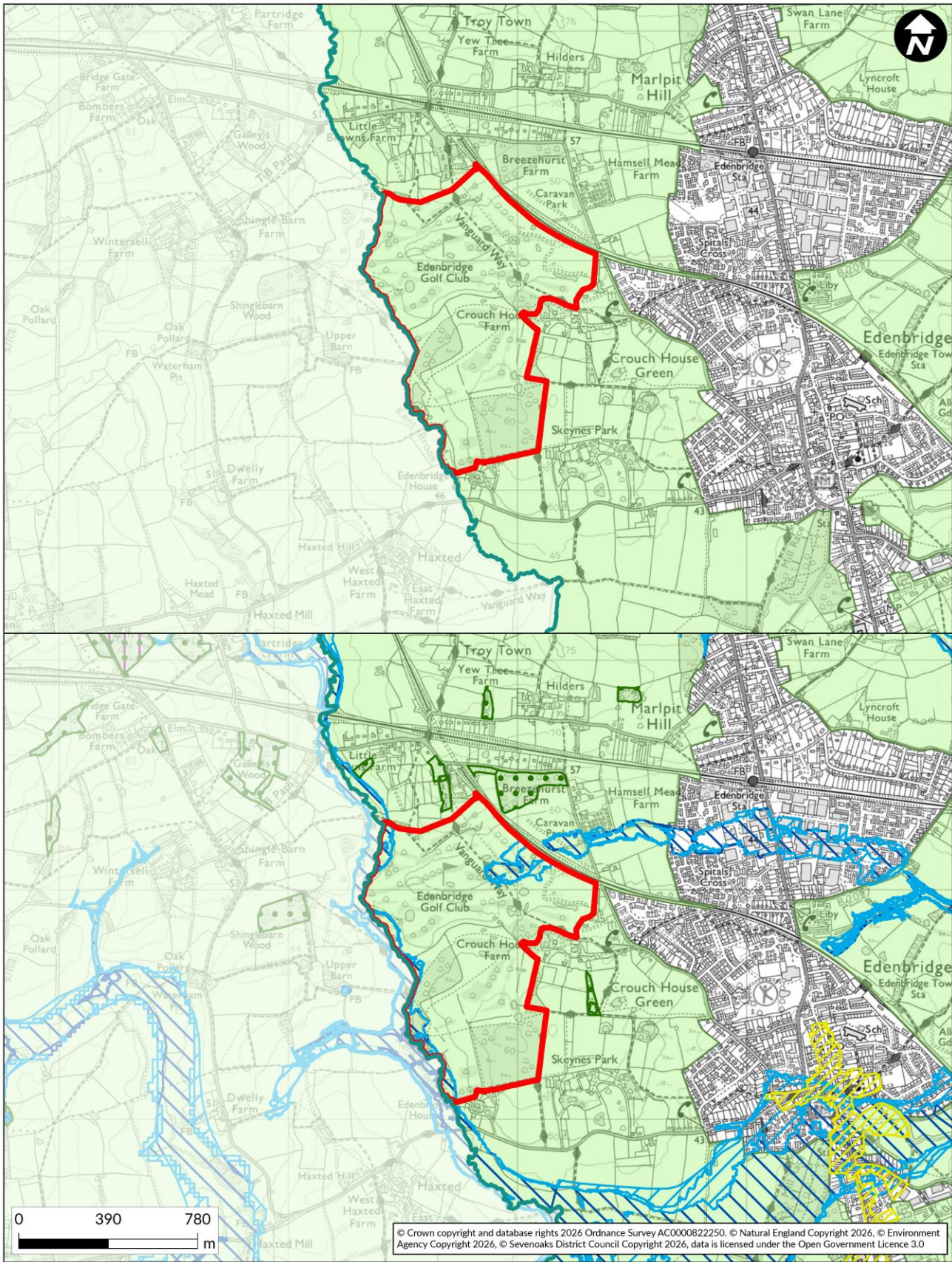
SHELAA 2026 CONCLUSIONS

Suitable?	This site is in the Green Belt, not adjacent to the boundaries of neighboring settlements. Some of the site is brownfield land, but much of the site is open land/fields/woodlands and a quarter of the site is a LWS (Tile Kilns Wood). The site is also 68% Grade 2 agricultural land, 13% Ancient & Semi-Natural Woodland, medium landscape sensitivity and in the vicinity of listed buildings. Currently insufficient information has been provided as to the proposed use this site. Due to the site not being directly adjacent to an existing settlement, and the buffer between the site and Swanley being intersected by the strategic road network, the site is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered to be available in years 6-10
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	This site is considered unsuitable and not directly adjacent to a settlement, includes a LWS, ancient woodland and Grade 2 agricultural land.

MX/25/00006

Former Kent & Surrey golf club, Crouch House Road, Edenbridge



SITE DETAILS	
SHELAA Reference	MX/25/00006
Site Area (Ha)	77.06
Developable Area (Ha)	77.06
Brownfield / Greenfield	Mixed
Planning History	Planning ref. 19/02834/OUT
Previous SHELAA Ref (2018)	HO331 forms part of this site
Site Description	This is a greenfield Green Belt site, which comprises a former golf course, where a small element of the site is adjacent to the urban confines of Edenbridge. The site is bound by the railway line to the north, Crouch House Road and residential development to the east. The remainder of the site is surrounded by open countryside and agricultural land. This version of the site does NOT include the Tandridge District Council area.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	0
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to Edenbridge
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Edenbridge	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes (golf course)	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Edenbridge	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscape	
Landscape Sensitivity	Medium-High (97.46%)	
Agricultural Land Quality	Grade 3 – 95%	
Flood Risk	2.55% in Flood Zone 2/7.64% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	Contaminated land assessment – if subject to previous soil importation	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	7.1% within Sub Alluvial River Terrace	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Limited capacity on transport network – may require improvements	
Settlement Classification	13.08% within 400m of Edenbridge	
Town and Local Centres	Within 2km of Edenbridge, Central Area, Edenbridge Northern Fringe, Edenbridge Southern Fringe	
Train Station	Within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
12	12	2

SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt site situated adjacent to the urban confines of Edenbridge, which is identified as a Town in the Settlement Hierarchy. The site is therefore considered to be in a sustainable location, close to existing services and facilities, although it is highlighted that given the size of this site, the western portion of the site is further away from these facilities and therefore considered to be less sustainable. The site lies fully within the Green Belt, although is considered to be grey belt under national policy, and the majority of the site is Medium-High landscape sensitivity. Primarily due to the landscape constraints, and the location of the site, with the majority of the site not adjacent to the settlement (which would leave a 'gap' in the Green Belt) it is not considered suitable for development.
Availability	The site has been submitted by the landowner and is considered available in years 1-5.
Achievability	No constraints that could render the site financially unviable at this time.
Deliverable/Developable?	Not currently developable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	Due to the constrained nature of this site, its boundary largely not adjacent to the settlement and location within Green Belt and area of landscape sensitivity, the site is considered unsuitable and is therefore not proposed for allocation.

NAG09
The Royal Oak Car Park, DA3 8EZ



SITE DETAILS	
SHELAA Reference	NAG09
Regulation 18 2025 Reference	NAG2
Site Area (Ha)	0.09
Developable Area (Ha)	0.1
Brownfield / Greenfield	Brownfield
Site Description	This is a brownfield site within the urban confines of New Ash Green. The site comprises a large area of hardstanding currently in use as a car park. The site is bound by a public house to the north, residential to the east and south, and Chapel Wood Road to the west.
Site Type	New Build
When will this development be delivered?	Years 1-5
Estimated Capacity	0
Settlement Capacity Comments	Site is in a suitable residential location. Moderate viability but reasonable prospect of delivery.
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within urban confines of New Ash Green
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Completely within New Ash Green	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Urban Confines	
Green Belt Stage 3	Not in the Green Belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 1 listed buildings; 100.0% within 200m of listed building 1275794	
Contamination Issues	No specific risk	
Noise Pollution	Requires Noise Assessment – traffic noise	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within New Ash Green	
Town and Local Centres	Within 800m of New Ash Green (Village Centre)	
Train Station	All stations are over 2km from access points	

GREEN	AMBER	RED
22	3	1

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	No responses were received from Statutory Consultees.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Ash-cum-Ridley</u> A response from Ash-cum-Ridley Parish Council objects to this site due to its relation to a community facility and being an asset to New Ash Green. In addition, the response sets out concerns regarding the density of the site, considering its edge of settlement location.
General Response	Respondents highlight that nine units would create over 90 dwellings per hectare, far above New Ash Green's 30 dph, risking urban sprawl and loss of village identity. Road access is unsafe at 40 mph with narrow lanes, no lighting and frequent congestion, while loss of the Royal Oak car park could harm the public house's viability and push parking onto local roads. The site allocation lacks details on unit design, infrastructure, funding and housing need. Local healthcare, schools and social services are already full, and public transport, cycle routes and active travel links are inadequate and may fail in bad weather. Infrastructure funding and phasing lack clear commitments and delivery plans omit essential road and transport improvements. Development may destroy rare habitats, harm protected species and increase flood risk by reducing open and agricultural land.
Key issues raised	Housing density, design and settlement character Road access and safety Site allocation justification and existing use Parking provision and community facility viability Local services capacity Public transport provision and active travel links Infrastructure funding, phasing and delivery commitments Biodiversity, habitats and open space loss

SITE PROMOTER RESPONSE

No response was received from the site promoter.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site situated within the urban confines of New Ash Green, which is identified as a Primary Service Settlement in the Settlement Hierarchy 2025. Accordingly, the site is considered to be in a sustainable location, close the key services and facilities within New Ash Green. It is noted that the site does not benefit from sustainable access to a railway station. It is considered that there is existing capacity on the transport network and that there is an existing access to the site off of Chapel Wood Road. It is noted that the site is currently in use as a car park, and that consultation responses have raised concern for the loss of a community facility, and it is noted that this is key to supporting the public house and therefore the loss of the car park is not considered acceptable. However, improvements may still be sought as part of this proposal. Consultation with Environmental Health indicates that the site requires assessments for Noise to be undertaken on this site. The site does not lie within the Green Belt or National Landscapes, and there are no significant constraints which would make this site unsuitable. Due to the proposed loss of the car park serving the public house, the site is considered to be unsuitable.
Availability	This site has been identified through the Settlement Capacity Study and landowner permission has been sought to confirm the sites inclusion in the Local Plan process.
Achievability	This site has been identified through the Settlement Capacity Study.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to the loss of parking serving a community facility.

SE04
Garage court off Hillingdon Avenue, TN13 3RA



SITE DETAILS	
Settlement Capacity Reference	SE04
Regulation 18 2025 Reference	SEV7
Site Area (Ha)	0.08
Developable Area (Ha)	0.1
Brownfield / Greenfield	Brownfield
Site Description	This is a brownfield site within the urban confines of Sevenoaks Urban Area. The site comprises residential garages and an area of hardstanding. The site is bound by residential development on all sides. There is an existing access to the site, off Hillingdon Avenue.
Site Type	New Build
When will this development be delivered?	Years 1-5
Estimated Capacity	0
Settlement Capacity Comments	Potential to create courtyard development on corner block.
SHELAA Conclusion	Unsuitable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within the urban confines of Sevenoaks Urban Area
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Completely within Sevenoaks	
Land Use (GF/PDL)	Previously Developed Land	
Existing use	Yes but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Urban Confines	
Green Belt Stage 3	Not within the Green Belt	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban	
Flood Risk	Partially within Flood Zones 2 and 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Within 100m of 3 locally listed assets	
Contamination Issues	Requires Contaminated Land Assessment – former use and proximity to former landfill	
Noise Pollution	No specific risk	
Air Quality	Requires Air Quality Assessment – near to existing AQMA	
Mineral Safeguarding Area	None	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within Sevenoaks Urban Area	
Town and Local Centres	Within 800m of St Johns and within 2km of Seal (High Street), Sevenoaks (Town Centre)	
Train Station	Within 800m of Bat & Ball	

GREEN	AMBER	RED
21	5	0

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights that this site lies with an easy walking distance of Sevenoaks Gravel Pits SSSI and Wildlife Reserve which could result in an increase in recreational pressure and as such, an assessment of any potential adverse impacts is recommended should the site move forwards to allocation.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Sevenoaks Town Council</u> A response from Sevenoaks Town Council highlights concern that new development in this area would create significant parking issues. The response sets out a number of infrastructure requests and improvements should a site come forward as an allocation.
General Response	Respondents highlighted peak time congestion around the Hillingdon Avenue garages site, particularly at school drop-off and pick-up times, and requested developer contributions for safe pedestrian crossings near Trinity School, Hospital Road and Millpond Close. Responses welcomed the brownfield use of the site to reduce Green Belt pressure and suggested a small playground and landscaping of the Hillingdon Avenue open-space woodland. Concerns were raised about increased parking pressure from limited off-street spaces. An assessment of recreational impacts on the Sevenoaks Gravel Pits SSSI was requested, together with construction phase mitigation and collaboration with Kent Wildlife Trust and Natural England to avoid adverse effects.
Key issues raised	Traffic congestion and peak-time capacity Highway safety and pedestrian crossing provision Brownfield redevelopment and Green Belt relief Local play and open space enhancement Parking provision and on-street parking pressure SSSI recreational disturbance and ecological impacts Developer contributions and planning obligations

SITE PROMOTER RESPONSE

No response was received from the site promoter.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a brownfield site situated within the urban confines of Sevenoaks Urban Area, which is identified as the Principal Town in the Settlement Hierarchy 2025. Accordingly, the site is considered to be in a sustainable location, close to key services and facilities. The site is well located for public transport, being within 800m of Bat & Ball Station. It is considered that there is existing capacity on the transport network, and the site benefits from an existing access off Hillingdon Avenue, which could be utilised. However, improvements may still be sought as part of this proposal. The site lies partially within Flood Zones 2 and 3 and given the size of this site, this is a key constraint to suitability. The site does not lie within the Green Belt or National Landscapes.. Consultation with Environmental Health indicates that the site requires assessments for Contaminated Land and Air Quality to be undertaken on this site. Due to the flooding constraints to this site, it is considered unsuitable for development.
Availability	This site has been identified through the Settlement Capacity Study and landowner permission has been sought to confirm the sites inclusion in the Local Plan process.
Achievability	This site has been identified through the Settlement Capacity Study.
Deliverable/Developable?	Unsuitable

Overall Conclusion	Unsuitable
	Do not include in Plan
SDC Comments	The site is considered unsuitable due to flooding constraints.