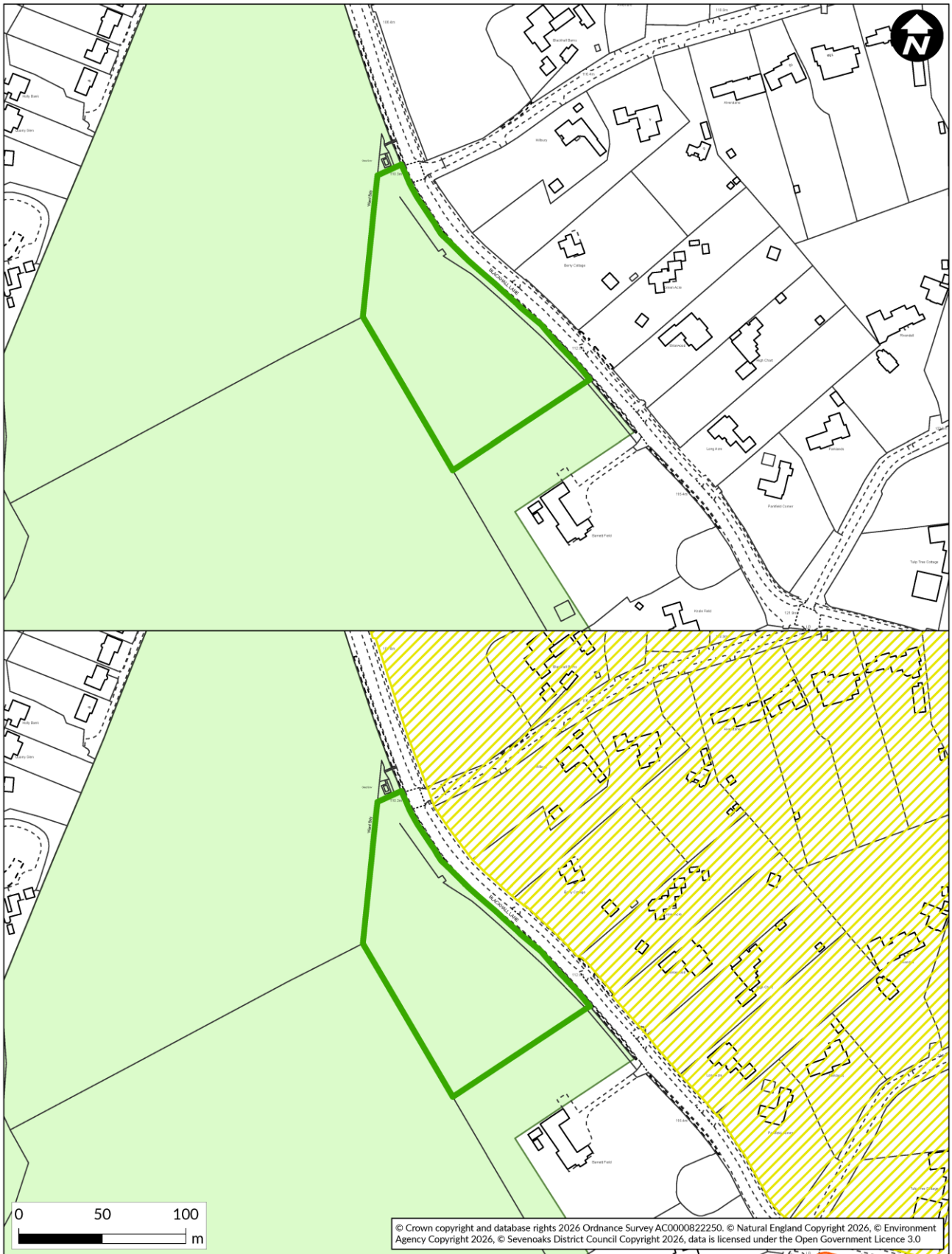


HO/24/00001
Land north of Barnett Field, Blackhall Lane, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/24/00001
Regulation 19 Reference	ST4-1
Regulation 18 2025 Reference	SEV20
Site Area (Ha)	1.17
Developable Area (Ha)	1.17
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 Sevenoaks Urban Area. The site currently comprises a paddock. The site is bound by Blackhall Lane to the east, greenfield land to the north and west, and residential to the south.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	15 residential units
SHELAA Conclusion	Suitable and Deliverable

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

SHELAA ASSESSMENT		
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	In the Green Belt adjacent to Sevenoaks	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints – limited impacts	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-high – 97.22%	
Agricultural Land Quality	Grade 3 – 88.56%	
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 Wildernesse conservation area Within 200m of 1 listed building Within 100 m of 1 locally listed asset	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	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	Within 400m of Sevenoaks	
Town and Local Centres	Within 2km of Seal, High Street, Sevenoaks – Town Centre, St Johns,	
Train Station	Over 2km from a railway station	

GREEN	AMBER	RED
18	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 falls within the setting of the Kent Downs National Landscape and advises that overarching advice on development in the setting of National Landscapes is referred to.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Sevenoaks Town Council</u> A response from Sevenoaks Town Council objects to development of this site on the grounds of site suitability constraints including the setting of the Wilderness Conservation Area, a Biodiversity Opportunity Area, the Green Belt and important views of the National Landscapes and Site of Special Scientific Interest (SSSI). The response also cites the density of surrounding development, the topography of the site, access and sustainability as reasons for objection. Should the site be taken forwards, the Town Council set out a number of local infrastructure improvement aspirations, which will be considered through the Infrastructure Delivery Plan (IDP) as appropriate.
Other Consultation Bodies	<u>Knole Park Golf Club</u> A response was received from Knole Park Golf Club objecting to this site, as well as the conclusions of Green Belt parcels SE13 and SE14 in the Green Belt Assessment. The response cites strongly performing Green Belt, sustainability and a number of other constraints, such as National Landscape and Sites of Special Scientific Interest (SSSI) as reasons for objection.
General Response	Responses set out concerns about highway safety and traffic, noting increased peak-time congestion, safety risks from narrow country lanes, lack of footpaths and public transport, and reliance on private cars. Heritage and landscape issues stress the site's Green Belt role in preserving open views around Knole

	Park, the Wilderness Conservation Area and Sevenoaks Town. Reclassification from Green Belt to grey belt is seen as weakening protections against urban sprawl. Potential ecological impacts include loss of habitats for protected species and disruption of wildlife corridors. Local infrastructure and utilities, including roads, schools, healthcare and sewage, are described as operating at capacity. The proposed housing density and layout are judged out of character with local plot sizes and heritage guidance. Critiques of the site's evidence base cite flawed green belt assessments, particularly in relation to parcels SE13 and SE14, and a lack of brownfield prioritisation.
Key topics raised	Highway safety, access and local traffic impacts Heritage, views and landscape setting Green Belt boundary and reclassification Sustainability, accessibility and travel dependence Ecology, habitats and wildlife corridors Local infrastructure capacity and utilities Design, density and contextual fit Site selection, evidence base and policy tests

SITE PROMOTER RESPONSE

Robinson Escott Planning

A response from Robinson Escott Planning, on behalf of the landowner, sets out that the conclusions in the SHELAA 2025 are fully endorsed by the site promoter and confirms that the site is available for development within the plan period and that the site allocation is fully supported.

SHELAA 2026 CONCLUSIONS

Suitable?	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 within Sevenoaks Town, although 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 constitute grey belt land under national policy, due to its performance under Green Belt purposes A, B and D. The Footnote 7 assessment has highlighted that the site is ear a designated heritage asset,
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	however this is considered to have a limited impact and therefore the sites grey belt status remains applicable. The site lies fully within medium-high landscape sensitivity which will need further consideration from the site promoter and through Development Brief work. The site benefits from an existing access, although it is considered that whilst a new access is not required, improvements to the existing access would be required. Whilst public consultation responses regarding site constraints are acknowledged, including the adjacent Conservation Area, nearby National Landscapes and SSSIs, there are not considered to be any overriding constraints for this site which would make the site unsuitable for the small scale development proposed. Importantly, there were no overriding objections or concerns raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these natural and historic environment concerns. Therefore, due to the unconstrained nature of the site and its sustainable location adjacent to a top tier settlement, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area, and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 15 residential units.
Allocated for	15 residential units
Regulation 19 (2026) Ref	ST4-1

HO/26/00001
Land at the Croft, Bradbourne Vale Road



SITE DETAILS	
SHELAA Reference	HO/26/00001
Regulation 19 Reference	ST4-2
Regulation 18 2025 Reference	SEV18/SEV21
Site Area (Ha)	0.39
Developable Area (Ha)	0.39
Brownfield / Greenfield	Majority greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO259
Site Description	This is a majority greenfield site adjacent to the urban confines of Sevenoaks Urban Area. The site comprises an area of scrubland, one residential unit and associated land. The site is bound by residential development to the north and west, Knole Academy Secondary School to the north and east, and the A25 Bradbourne Vale Road to the south. The site has an existing access off of the A25.
Site Type	Residential
When will this development be delivered?	Years 1-5
SHELAA Yield	20 residential units
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to 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	Residential, but to be reprovided	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Sevenoaks	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium – 96.86%	
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 2 Listed Buildings Within 100m of 1 Locally Listed Asset	
Contamination Issues	Contaminated Land (former landfill site)	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	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	Within 400m of Sevenoaks	
Town and Local Centres	Within 800m of St Johns Within 2km of Dunton Green, Riverhead, Sevenoaks Town Centre, Tubs Hill and Sevenoaks Station	
Train Station	Within 2km of Bat & Ball and Sevenoaks	

GREEN	AMBER	RED
16	9	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 walking distance of Sevenoaks Gravel Pits SSSI and Wildlife Reserve, which could potentially result in an increase of recreational pressure and bird disturbance on the site. As such, an assessment of any potential adverse impacts on the SSSI such as recreational disturbance as a result of developments will be required as part of any planning application. In addition, the response encourages working in partnership with Kent Wildlife Trust.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	No responses were received from Town and Parish Council.
Other Consultation Bodies	<u>Kent Wildlife Trust</u> A response from Kent Wildlife Trust highlights concerns that the cumulative impact of sites to the north of Sevenoaks would result in the Sevenoaks Wildlife Reserve and SSSI being effectively enclosed by development, fragmenting the existing landscape and impacting connectivity between habitats, and includes detailed concerns regarding habitat protection and the Sevenoaks Gravel Pit SSSI. The response also highlights concerns for the cumulative impacts of site allocations to the River Darent Chalk Stream and surrounding habitat.
General Response	<u>General Response to SEV18</u> Respondents consider six homes excessive on the small greenfield plot behind The Croft, raising density concerns and doubting the site's ability to accommodate the scheme. Tensions over greenfield and Green Belt status are noted, alongside risks to habitats, flood zones 2 and 3 and potential precedent for further rural development. Responses state that the narrow, unmade access track offers limited visibility and width,

	potentially restricting emergency vehicles and adding collision and drop-off hazards. Local water, sewage and GP services are deemed insufficient for extra dwellings. Responses highlight that the proximity to Sevenoaks Gravel Pits SSSI could intensify recreational disturbance to protected species without robust mitigation and that the potential impacts on Oast Cottages residents and heritage settings require a full appraisal. Wider concerns on the cumulative impact of development highlight that encirclement of the wildlife reserve by up to 1,856 new homes and removal of natural drainage features may heighten flood risk and habitat loss. Further concerns include geese habitat disruption, peak-hour traffic and parking pressures and calls to prioritise brownfield development over green spaces. <u>General Response to SEV21</u> Respondents express concern that the proposed development may overwhelm local infrastructure, citing narrow, potholed access via an unmade track and limited connections to the A25, while junctions near Knole Academy already suffer congestion at drop-off and pick-up times. There are concerns that water pressure and sewage systems could face further strain, and additional vehicles may exacerbate gridlock on Bradbourne Vale Road, extend commute times and heighten air pollution, alongside overcrowded train services and GP surgeries. The development's density is viewed as unsuitable for the site's size and could encircle the Sevenoaks Wildlife Reserve with development, while recreational disturbance and habitat loss may harm the nearby SSSI and protected species without robust mitigation measures. Neighbour amenity is also raised, with potential loss of light and views for dwellings off the track and reduced parking being highlighted. Responses also set out that much of the site lies in flood zones 2 and 3, risking increased flooding and the historic orchard setting of a Grade II listed farmhouse and a protected copper beech tree could be adversely affected.
Key issues raised	Scale, density, site suitability and cumulative impacts Green Belt, greenfield, planning designation and precedent Planning status and policy compliance Access, highway safety and track conditions Biodiversity and protected site impacts (SSSI) Neighbouring residential amenity and heritage properties Landscape connectivity, encirclement and cumulative impacts Flood risk, surface water and natural drainage Local infrastructure, utilities and service capacity Ecology, SSSI effects and wildlife corridors

Heritage and arboricultural assets

SITE PROMOTER RESPONSE

Landowner response (SEV18)

A response from the landowner for the portion of the site which formed SEV18 at Regulation 18, confirms support for and the availability of the site for allocation in the Local Plan, as well as providing specific comment on the details included within the SHELAA in terms of phasing and deliverability.

Peter Court Associates on behalf of the landowners (SEV21)

A response from Peter Court Associates, on behalf of the landowner for the portion of the site which formed SEV21 at Regulation 18, confirms support for and the availability of the site for allocation in the Local Plan, highlighting the highly sustainable location adjacent to Sevenoaks Urban Area and the sites performance against Green Belt purposes.

SHELAA 2026 CONCLUSIONS

Suitable?

This is a greenfield site situated adjacent to the urban confines of Sevenoaks Urban Area, which is the District's Principal Town, as identified in the Settlement Hierarchy 2025, and is therefore considered to be in a sustainable location. The site is close to existing key services and facilities in Sevenoaks Town, Bat and Ball and Riverhead, including access to two train stations, on different lines, at Bat and Ball and Sevenoaks. The site lies fully within the Green Belt, however it is considered to constitute grey belt land under national policy due to its performance against Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and notes that the site is near to a Designated Heritage Asset. However, it is considered that there is limited impact and that the site constitutes grey belt. Being a former landfill site, the site is contaminated land which would require further consideration. There is considered to be capacity on the surrounding road network, although contributions may be sought if a scheme comes forwards. The site would require a new access to be provided. There are no other constraints which would make the site unsuitable and therefore, due to the sites location adjacent to Sevenoaks Urban Area, the site is considered suitable for development.

Availability

The site has been submitted by the landowner and is considered available in years 1-5

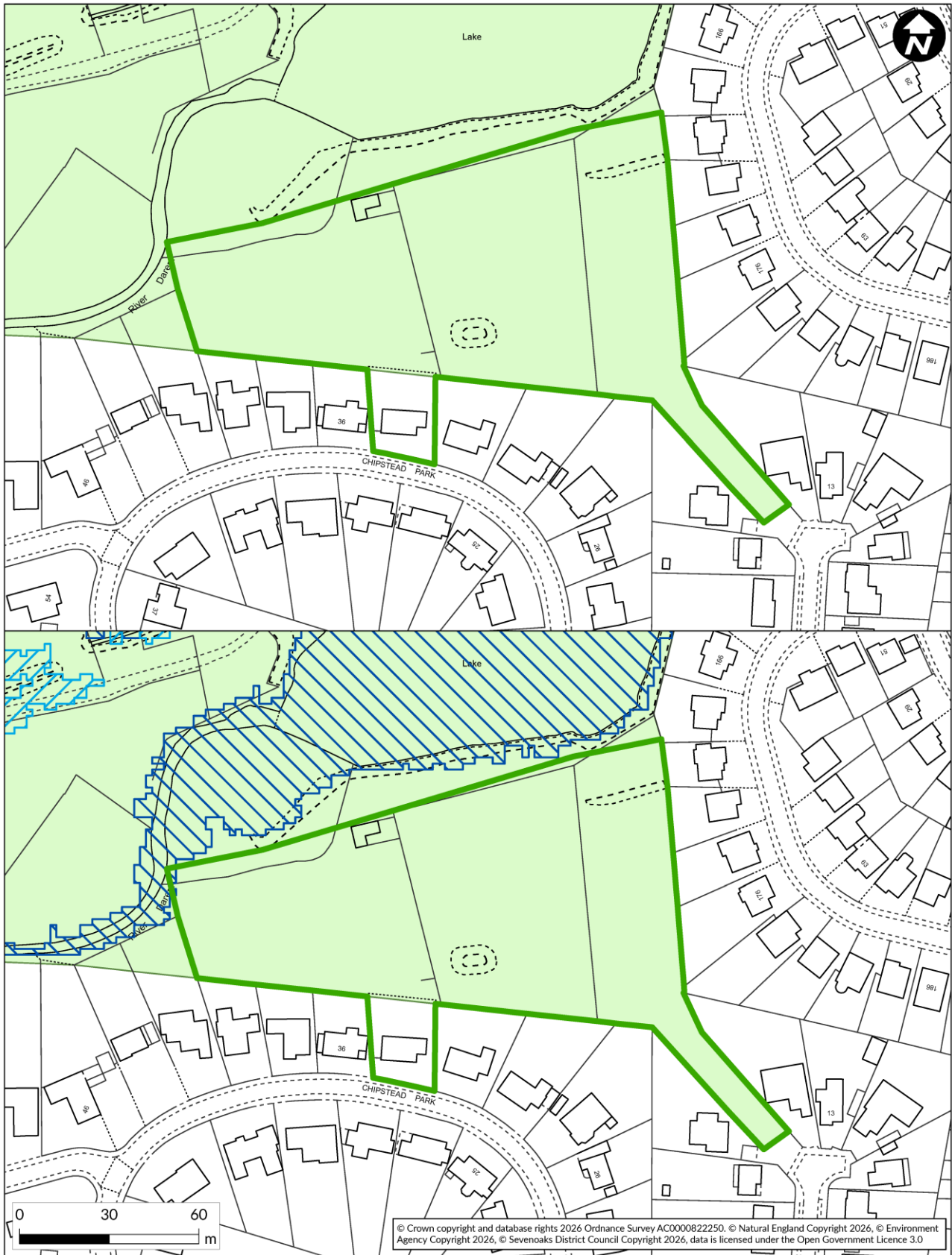
Achievability

No constraints that could render the site financially unviable at this time.

Deliverable/Developable?	Deliverable
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Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a majority greenfield site adjacent to the urban confines of Sevenoaks Urban Area and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 26 residential units.
Allocated for	20 residential units
Regulation 19 (2026) Ref	ST4-2

HO/21/00279
Land to the rear of 34 Chipstead Park, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/21/00279
Regulation 19 Reference	ST4-3
Regulation 18 2025 Reference	SEV23
Site Area (Ha)	1.24
Developable Area (Ha)	1.24
Brownfield / Greenfield	Partially brownfield
Planning History	None
Previous SHELAA Ref (2018)	HO291
Site Description	This is a partially brownfield site partially within and adjacent to the urban confines of Sevenoaks Urban Area. The site comprises a parcel of land containing a residential property in Chipstead Park and two fields not in active use. The site is bound by Chipstead Park and residential development to the south and east, and Chipstead Lake to the north and west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	40 residential units (older persons housing)
SHELAA Conclusion	Suitable and Deliverable

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

SHELAA ASSESSMENT		
Within Urban Confines	Partially within Sevenoaks	
Land Use (GF/PDL)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes but will be reprovided	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Partially within Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No footnote 7 constraints	
National Landscape	Not within National Landscape	
Landscape Sensitivity	95.1% Medium	
Agricultural Land Quality	Urban - 93.99%; Other - 6.01%	
Flood Risk	0.12% in Flood Zone 2 and 0.12% 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	Not within Ancient Woodland	
Presence of Heritage Assets	Not applicable	
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 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 2km of Dunton Green; within 2km of Riverhead (walkable and cycle friendly)	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
16	9	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 refers to specific guidance for site allocations.
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>Laura Trott MP</u> A response from Laura Trott MP raises concerns regarding access to the site, flooding risks, contamination and mineral safeguarding areas, sustainability and distance to local services and facilities and the biodiversity of Longford Lake.
General Response	Respondents highlight narrow, steep roads with limited visibility and no scope for widening, with concerns that new homes would increase congestion, safety risks and parking pressure. They question local infrastructure capacity given full schools, long healthcare waits, ageing utilities and infrequent public transport. They highlight that the low-lying floodplain and aged drainage systems around Longford lake would result in increased runoff and flood risk. Concerns extend to loss of mature trees, habitat fragmentation and light pollution, harming protected species and biodiversity net gain. The proposed density and layout would conflict with the area's low rise development and spacious character, risking privacy and amenity. Respondents challenge the site's removal from the Green Belt, emphasising its role in preventing sprawl and preserving the conservation area setting. Mineral safeguarding, radon risk, covenant restrictions and absence of detailed technical assessments raise doubts about the site's deliverability and policy compliance.
Key issues raised	Access and highway safety Local infrastructure and service capacity

	Flood risk and surface-water drainage Ecology, biodiversity and lighting Density, residential amenity and layout Green Belt/planning policy conformity Legal, ownership and technical deliverability constraints Heritage and local character
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SITE PROMOTER RESPONSE

DHA on behalf of Ashberry Strategic Land Limited

A response from DHA Planning on behalf of Ashberry Strategic Land Limited, as the site promoter, confirms support for the proposed allocation in the Regulation 18 consultation and confirms availability of the site within the Plan period. The response provides further site specific detail, including a vision document, as well as wider commentary on the Local Plan and emerging Development Strategy.

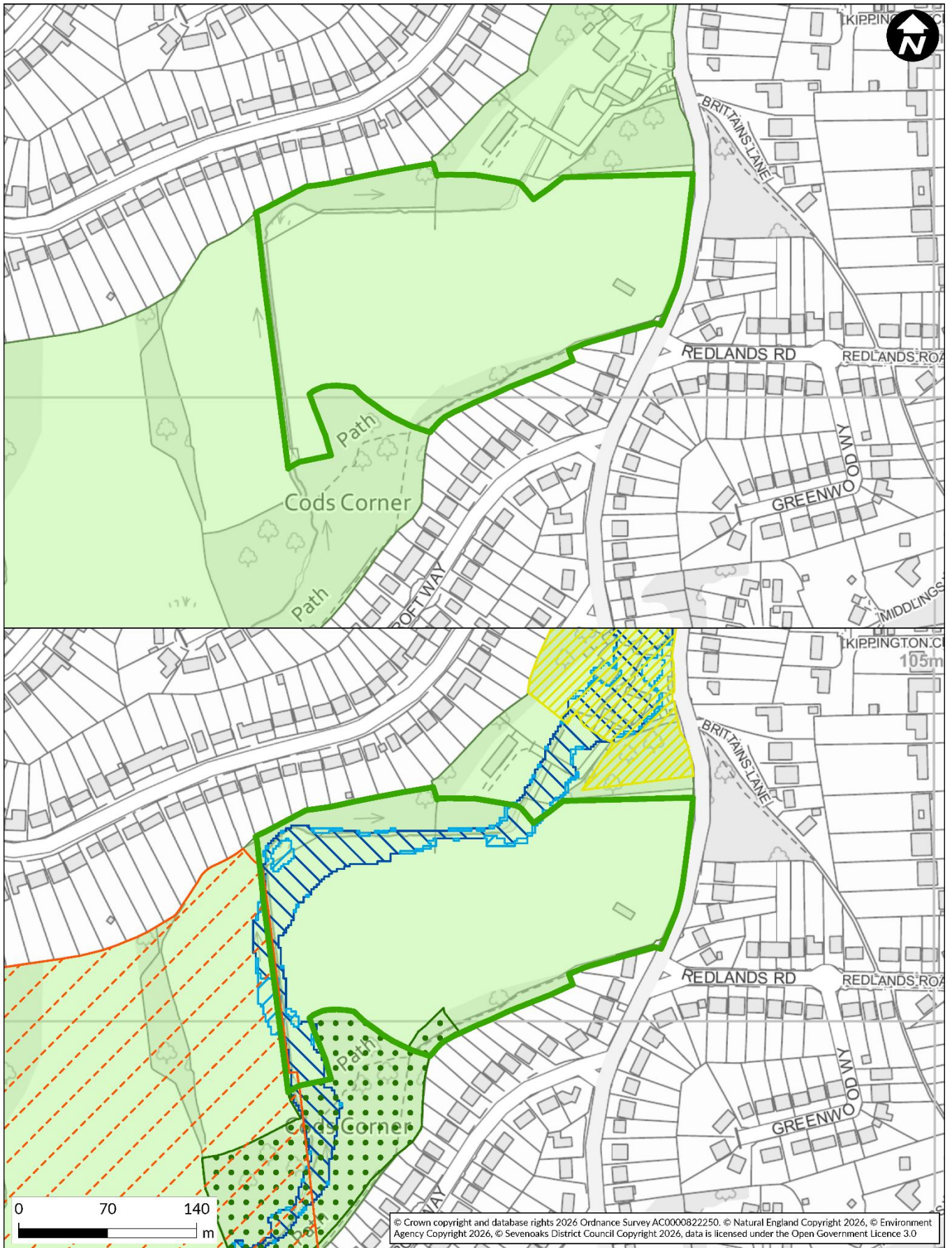
SHELAA 2026 CONCLUSIONS

Suitable?	This is a mixed greenfield/brownfield site partially within and 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. It is noted that both Dunton Green and Sevenoaks train stations lie just over 2km from the site. The site lies fully within the Green Belt, but is considered to constitute grey belt under national policy, due to its performance against Green Belt purposes A, B and D. A Footnote 7 Assessment highlights that there are no footnote 7 constraints applicable to this site. The site is not within National Landscapes. The site is within a mineral safeguarding area, which will need further consideration, and would require a contaminated land and air quality assessment should a scheme come forwards on this site. There are no other constraints which would make this site unsuitable. Therefore, due to the sustainable location of this site, its grey belt status and unconstrained nature, the site is 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?	Deliverable
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Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Sevenoaks Urban Area and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 40 residential units.
Allocated for	40 residential units
Regulation 19 (2026) Ref	ST4-3

HO/24/00014
Land west of Brittain's Lane, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/24/00014
Regulation 19 Reference	ST4-4
Regulation 18 2025 Reference	Part of SEV17
Site Area (Ha)	5.25
Developable Area (Ha)	7.23
Brownfield / Greenfield	Greenfield
Planning History	Outline application (21/04236/OUT) for up to 70 dwellings (including 50% affordable housing and 10% Self-Build) dismissed at appeal (APP/G2245/W/22/33048246).
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area. The site comprises an area of agricultural land and is bound by residential to the north, east and south, open countryside to the west and Brittain's Lane to the east.
Site Type	Residential
When will this development be delivered?	Years 6-10
SHELAA Yield	56 residential units
SHELAA Conclusion	Suitable and Developable

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

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to Sevenoaks	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	Cods Corner, Riverhead Natural & Semi Natural 3.4%	
Green Belt	In the Green Belt adjacent to Sevenoaks	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
National Landscapes	27.18% within Kent Downs	
Landscape Sensitivity	Medium – High 98% within S4 Sevenoaks west Residential Sensitivity: Medium - High	
Agricultural Land Quality	Grade 3 – 86%	
Flood Risk	2% in Flood Zone 2 and 11% 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	0.92% within Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	52% within 200m of Sevenoaks - Brittain's Farm conservation area; Within 200m of 5 listed buildings; 3% within 200m of Scheduled Monument Montreal Park obelisk; Within 100m of 3 locally listed assets	
Contamination Issues	Contaminated land assessment – part of site within 250m of former landfill	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	85% within Limestone – Hythe Formation – Kentish Ragstone	
Site Access	New access required	
Network Capacity	Capacity on transport network (contributions may still be sought)	
Settlement Classification	100% within 400m of Sevenoaks Urban Area	

Town and Local Centres	Within 2km of Riverhead, Sevenoaks – Town Centre, Tubs Hill and Sevenoaks Station	
Train Station	Within 2km of Sevenoaks	

GREEN	AMBER	RED
11	14	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 partially within the Kent Downs National Landscape and partially within its immediate setting. The response also highlights the presence of desire lines on the site. <u>The Environment Agency</u> A response from the Environment Agency highlights that any development proposal must be supported by a Flood Risk Assessment (FRA) which must demonstrate the flood risk to the site can be managed to an acceptable level. It is expected that any potential layout to follow the Sequential Approach by placing more vulnerable forms of development within the areas at least risk of flooding and keeping the areas at high risk as open space.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Riverhead Parish Council</u> A response from Riverhead Parish Council objects to the site due to the cumulative impact of nearby developments which would place unsuitable pressure on already congested A25 junctions, increase road safety risks and strain local schools, healthcare and services. The response also raises concerns about harm to biodiversity and an unbalanced distribution of growth. The response calls for major infrastructure improvements, increased service capacity, environmental protection and fair funding to mitigate these impacts.

	<u>Sevenoaks Town Council</u> A response from Sevenoaks Town Council considers the site unsuitable and its inclusion as a proposed allocation to be premature, citing its sensitive greenfield location within the setting of the Kent Downs National Landscape, likely landscape and heritage harm and unresolved access concerns. The response reflects upon a 2022 appeal dismissal and does not find any exception justification for development to support the allocation, though it does outline strict mitigation requirements if the site were to proceed.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP objects to the proposed site, citing the lack of footnote 7 assessment, topography, harm to the National Landscape setting, contrary to emerging Policy NE1 and discussions on this site at a 2023 appeal. The response also highlights concerns for the cumulative impact of development on surrounding infrastructure and services. <u>The Woodland Trust</u> A response from The Woodlan Trust highlights that there is an area of Ancient and Semi Natural Woodland adjacent to the southern boundary of the site and recommends that the boundary be reconsidered. <u>Kent Downs National Landscape</u> A response from Kent Downs National Landscape opposes the site due to the recent appeal decision for part of the site being dismissed, with the Inspector finding it has a clear open countryside character closely linked to the Kent Downs National Landscape. The response sets out that development would harm the setting of the National Landscape and erode the relationship between Sevenoaks Urban Area and the countryside. <u>CPRE Kent</u> A response from CPRE Kent objects to the development, citing strongly performing green belt, the sites location within Kent Downs National Landscape and sustainability as key concerns.
General Response	Respondents highlight narrow, winding access routes with limited footpaths and poor sightlines and that HGV movements during the construction phase could worsen congestion and safety risks in the area. Registered ancient woodland and adjoining habitats, supporting protected species, require tree and green infrastructure retention and buffer zones to avoid fragmentation. The floodplain setting raises concerns over added

	surface water runoff, sediment release and a missing sustainable drainage plan in the proposals. Infrequent buses, distant shops and ageing utilities are perceived to undermine location sustainability. Responses highlight that the steep topography of the site requires large earthworks, with noise, dust and visual impacts. There are additional concerns that the proposed reclassification from Green Belt to grey belt in national policy remains untested and adds uncertainty
Key issues raised	Highway access and road safety Ancient woodland and biodiversity Flood risk and surface water management Accessibility and sustainability of location Local infrastructure, services and utilities capacity Heritage setting and conservation area impacts Topography, ground conditions and engineering (earthworks/quarrying) Green Belt designation and grey-belt reclassification (footnote 7)

SITE PROMOTER RESPONSE

Woolf Bond Planning Ltd on behalf of Croudace Homes

A response from Woolf Bond Planning Ltd, on behalf of Croudace Homes, as the site promoter, supports the proposed allocation in the Regulation 18 consultation and reaffirms availability of the site for development within the Plan period. The response provides further information on the site proposals, including an illustrative masterplan and technical notes. The response also makes comment on wider aspects of the emerging Local Plan including the Plan period and housing need.

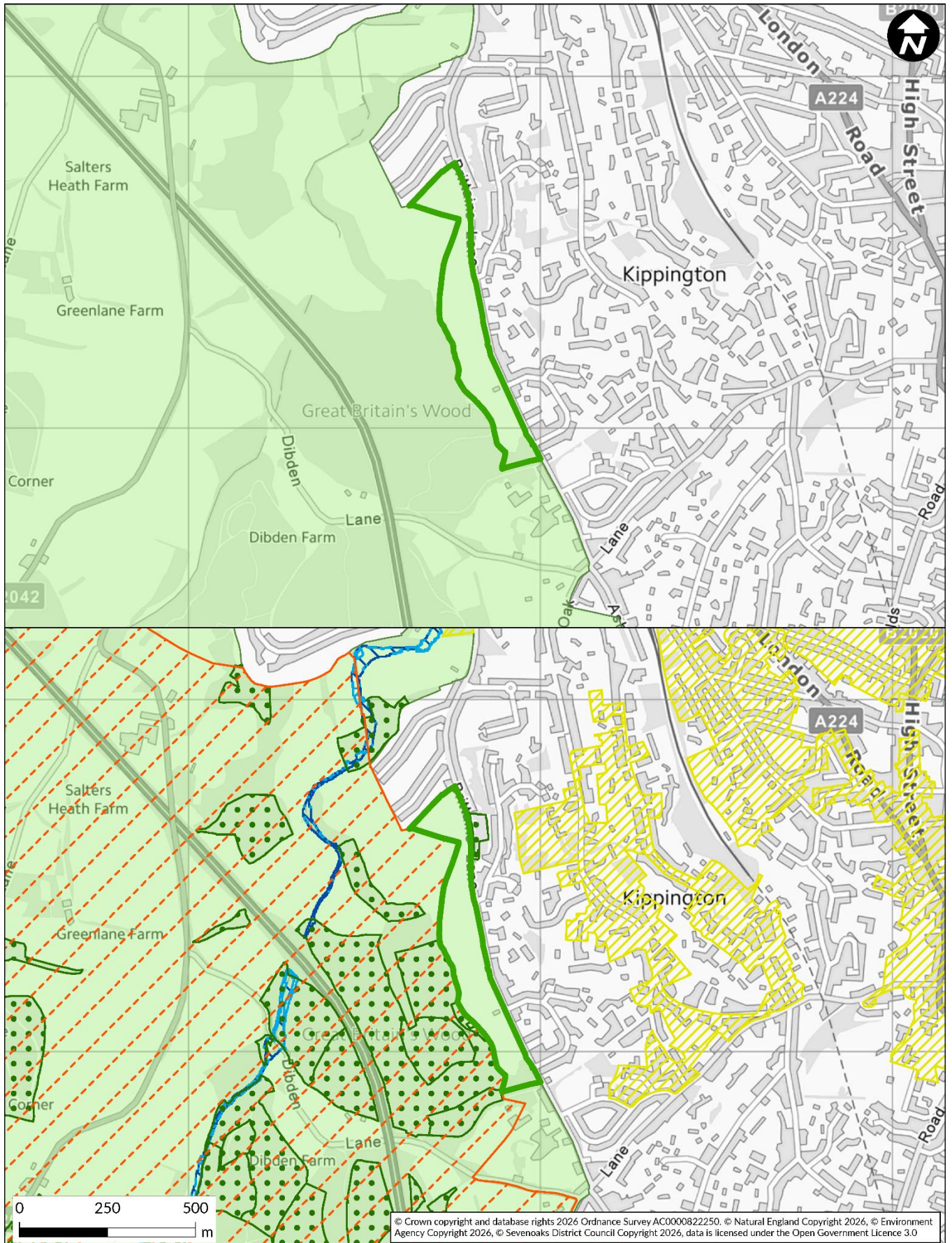
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt 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 key services and facilities and within walking distance of Sevenoaks Railway Station. The site is fully within the Green Belt and is considered to be grey belt under national policy, due to its performance against Green Belt purposes A, B and D. A quarter of the sites lies within the Kent Downs National Landscape (this portion is not considered suitable for development) and the site is medium-high landscape sensitivity. A contaminated land
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	assessment would be required for this site due to the proximity to former landfill. The Strategic Flood Risk Assessment Level 2 identifies fluvial and surface water flood issues on this site and it is considered the site could be developed if the site-specific guidance, as set out in the site sheet is followed, taking a sequential approach to locating buildings out of areas of fluvial and surface water flood risk. In addition, consideration would need to be given to the sites proximity to Brittain's Farm Conservation Area, a number of heritage assets and the Mineral Safeguarding Area. It is noted that access points are proposed off Brittain's Lane, in similar locations to those deemed acceptable with the previous planning application and appeal for this site. Due to the location of the site and its grey belt status, it is 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?	Developable (Years 6-10)

Overall Conclusion	Developable
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Sevenoaks Urban Area and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 56 residential units.
Allocated for	56 residential units
Regulation 19 (2026) Ref	ST4-4

HO/26/00014
Brittains Lane, Kippington, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/26/00014
Regulation 19 Reference	ST4-5
Site Area (Ha)	8.09
Developable Area (Ha)	8.09
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO120
Site Description	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area. The site comprises a parcel of land west of Brittain's Lane, containing a number of agricultural fields used for arable crop production. The site is bound by Brittain's Lane and residential development to the east, residential development to the north and south, agricultural land to the north and woodland to the west. The site slopes gently upwards from south to north and enjoys a significant amount of road frontage.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	228 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – Adjacent to urban confines of Sevenoaks Urban Area
Stage 1 Conclusion	PROGRESS TO STAGE 2

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 existing allocations	
Proposed use / designation	No proposed allocations	
Green Belt	Within the Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 Assessment	
National Landscape	Not within National Landscapes	
Landscape Sensitivity	99.96% Medium - High	
Agricultural Land Quality	Grade 3 – 77.59%	
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 – Kippington and Oakhill Road Conservation Area Within 100m of 4 locally listed assets	
Contamination Issues	Contaminated Land Assessment (former adjacent land use)	
Noise Pollution	Noise Assessment (A21)	
Air Quality	Air Quality Assessment (impact on local AQMA)	
Mineral Safeguarding Area	Partially within Mineral Safeguarding Area 84.62%	
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 2km of Riverhead, Sevenoaks Town Centre and Tubs Hill and Sevenoaks Station	
Train Station	Within 2km of Sevenoaks	

GREEN	AMBER	RED
13	11	3

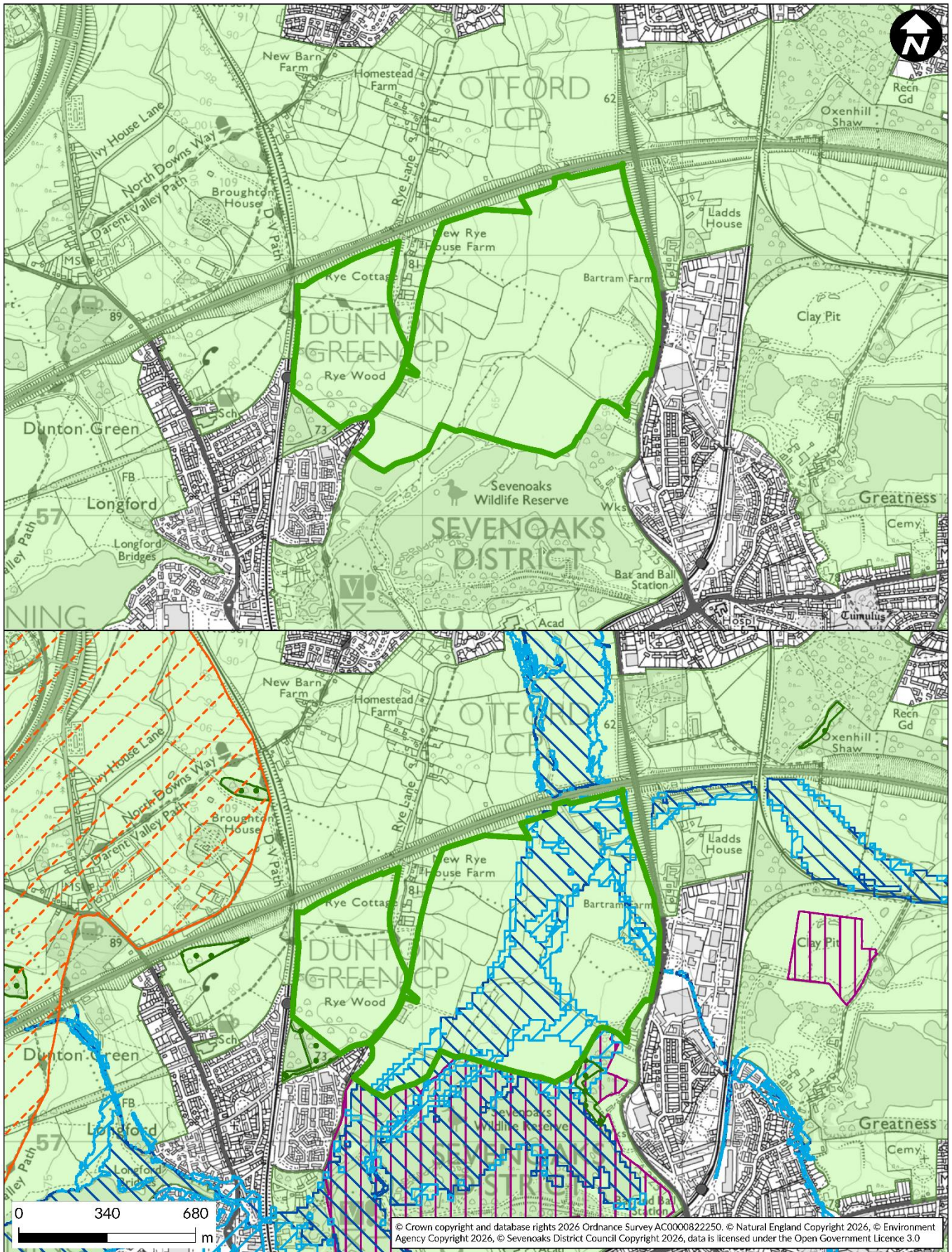
SHELAA 2026 ASSESSMENT

SHELAA 2026 CONCLUSIONS

Suitability	This is a greenfield site in the Green Belt adjacent to 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 highly sustainable location, close to existing key services and facilities, including access to Sevenoaks Train Station. The site is considered to be grey belt under national policy and its performance against Purposes A, B and D. The Footnote 7 Assessment identifies the presence of footnote 7 constraints, namely National Landscape and potential heritage and landscape impacts, however it is considered that this can be addressed through the Development Brief work and therefore the grey belt status of the site remains unchanged. The site lies partly within designated open space and the Ancient Woodland. The majority of the site is medium-high landscape sensitivity. Due to the relatively unconstrained nature of the site, grey belt status and sustainable location, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to Sevenoaks Urban Area and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 228 residential units.
Allocated for	228 residential units
Regulation 19 (2026) Ref	ST4-5

HO/25/00012
Land north of Sevenoaks, west of Otford Road.



SITE DETAILS	
SHELAA Reference	HO/25/00012
Regulation 19 Reference	ST4-7
Regulation 18 2025 Reference	SEV24
Site Area (Ha)	106.49
Developable Area (Ha)	106.49
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	Large greenfield site to the North of Sevenoaks town, bounded by motorway (M26) to the north, Otford Road to the east, the railway line and Dunton Green station to the west and Sevenoaks Nature Reserve to the south. Rye Lane and the River Darent both run through the site north-south.
Site Type	New Build
When will this development be delivered?	Years 6-10, 11+
SHELAA Yield	1,500 residential units
SHELAA Conclusion	Suitable and Developable

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	
Land Use (GF/PDL)	Greenfield	
Existing use	Grazing/agricultural	
Existing allocation / designation	None	
Proposed use / designation	No	
Green Belt	Within Green Belt adjacent to Sevenoaks	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
National Landscapes	Not within a National Landscape	
Landscape Sensitivity	Within S6 Sevenoaks north Residential Sensitivity: Low - Medium	
Agricultural Land Quality	Urban - 12.3%; Grade 3 - 14.4%; Grade 4 - 73.3%	
Flood Risk	11.77% in Flood Zone 2 23.87% in Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Adjacent to SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within an LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	0.04% within 15m buffer of Ancient & Semi-Natural Woodland; 0.34% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Within 200m of 1 listed buildings; Within 100m of 1 locally listed assets	
Contamination Issues	Contaminated land assessment – former landfill and land use	
Noise Pollution	Noise assessment – traffic noise	
Air Quality	No specific risk	
Mineral Safeguarding Area	52.05% within Sub Alluvial River Terrace	
Site Access	Access is proposed via Otford Road (contributions towards improvements may still be sought)	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	60.66% within 400m of Sevenoaks	

Town and Local Centres	Access points within 2km of Dunton Green; Otford High Street; Riverhead; St Johns,	
Train Station	Access points within 800m of Dunton Green station and within 2km of Bat and Ball station	

GREEN	AMBER	RED
14	7	4

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees

Natural England

A response from Natural England highlights that the site falls within the setting of the Kent Downs National Landscape and lies immediately adjacent to Sevenoaks Gravel Pits SSSI. Furthermore, the response highlights concerns that the proposed site would encompass the SSSI in urban development and could sever connectivity to the wider landscape, potentially risking development impacting on the River Darent and as such the respondent is pleased that the Development Brief has recognised the need for a 'Central Meadow Green' to provide an open naturalistic corridor between the SSSI and the wider landscape. The site is also noted to be immediately adjacent to parcels of ancient woodland and contains a public right of way.

National Highways

A response from National Highways notes that the site would alleviate east-west movement through the town and that public transport and active transport would be prioritised within the development.

The Environment Agency

A response from the Environment Agency highlights that the River Darent, a rare chalk stream with 'moderate' status, must be protected from deterioration under the Water Framework Directive Regulations 2017. It stresses that development within the allocation should avoid impacting river processes, including preventing culverting, avoiding direct surface water discharge and providing an undeveloped buffer, while also taking opportunities to enhance the river and its tributaries.

	<u>Transport for London</u> A response from Transport for London highlights that the site poses transport related challenges, namely road congestion, limited active travel infrastructure and limited bus access. The site has strong rail connections, with Dunton Green station located on the western edge, however frequencies are limited to two trains per hour. With appropriate investment in sustainable transport infrastructure, this site could be delivered at a much higher density than currently proposed. The response also highlights a number of cross boundary impacts. <u>Network Rail</u> A response from Network Rail notes that the constraints of flooding to the east and the sensitivity of the SSSI to the south and National Landscapes to the north. Dunton Green railway station lies to the west of the site and limited access to the eastern platform restricts station usage. The opportunity to connect proposed development with the eastern platform should be pursued. This will open access to the station. In addition, station upgrades including, but not limited to, new lighting, CCTV and station improvements such as new waiting shelters would also be required to make the station safe for passengers.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Dunton Green Parish Council</u> A response from Dunton Green Parish Council considers the site fundamentally unsuitable for allocation, considering that the site is not 'grey belt' or poorly performing Green Belt. Other concerns relate to the Flood Zone, Special Protection Zone and adjacent SSSI, sustainability of the site and car dependency, air quality, ecological integrity and groundwater protection. The response raises concerns that the cumulative impacts of the development are not addressed and that development is considered inconsistent with a number of proposed Local Plan policies. <u>Otford Parish Council</u> A response from Otford Parish Council supports the objections submitted by Dunton Green Parish Council to the proposal, citing the sites scale and its likely cumulative impact alongside multiple nearby developments. The Council is concerned that the resulting pressure on already strained infrastructure, services and roads, combined with the risks to settlement separation and

	rural character, would conflict with national planning policy. It therefore calls for a full assessment before any decision is made. <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. <u>Sevenoaks Town Council</u> A response from Sevenoaks Town Council, whilst acknowledging potential benefits such as new housing and public open space, raises serious concerns about design, access, density and compatibility with surrounding areas. The response emphasises the need for robust environmental protection, detailed masterplanning and meaningful stakeholder collaboration. The response highlights gaps in community infrastructure, such as sports provision, play areas and affordable housing, and stresses the importance of integrating governance structures, ensuring Section 106 agreements involve Town and Parish Councils, and addressing the cumulative infrastructure pressures (transport, healthcare, utilities). The response also identifies specific infrastructure improvements, including walking and cycling links, allotments, and enhanced access to the wildlife reserve and stresses the need for improved transport connectivity and healthcare capacity.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights a number of significant concerns for this proposed site including Footnote 7 constraints, flooding, access and highways capacity (particularly at Rye Lane), cumulative impacts of approved development nearby, rail capacity, healthcare and the cumulative impact on infrastructure and grey belt policy concerns.

	<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. <u>CPRE Kent</u> A response from CPRE Kent sets out objections to the site on the grounds of strongly performing Green Belt, the impacts on the River Darent, ecology, sewage treatment works, the adjacent Sevenoaks Wildfowl Reserve and grey belt policy.
General Response	Respondents highlight that the site lies within the Green Belt, safeguarding open countryside and preventing settlement sprawl and merging between Sevenoaks, Otford and Dunton Green, with concerns that development could erode this gap and alter the landscape setting. It is stated that most of the site is within Flood Zones 2 and 3 and that hard surfaces may increase run-off, exacerbate fluvial flooding and disrupt the River Darent chalk stream, without adequate SuDS or sequential testing. The proximity of the site to the Sevenoaks Wildlife Reserve SSSI risks fragmenting habitats for bats, water voles and other protected species, and there are concerns that the proposed green buffers may not meet biodiversity net gain requirements. Local main roads and rural lanes currently operate at capacity, and unfunded junction upgrades may fail to absorb traffic from the proposed 1,500 homes. Nearby rail and bus services are overcrowded, station access is constrained, and active travel routes face gradient and lighting issues. Schools, GP surgeries, sewage, water supply and power networks are at or near capacity with no confirmed expansion plans. Best and most versatile agricultural land, mineral safeguarding zones and a former landfill area may further limit deliverability. Key technical assessments and binding infrastructure commitments are missing, and it is perceived that consultation materials lack clarity on evidence.
Key issues raised	Landscape, Green Belt function and settlement separation Flood risk and chalk-stream hydrology

	Biodiversity, SSSI adjacency and ecological connectivity Highway network capacity and junction modelling Utilities, wastewater and public services capacity Local access geometry and safety (Rye Lane/Station Road) Public transport and station capacity Agricultural land, minerals and deliverability constraints
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SITE PROMOTER RESPONSE

Woolf Bond Planning Ltd on behalf of Fairfax

A response from Woolf Bond Planning Ltd on behalf of Fairfax, as the site promoters, confirms support for the strategic housing allocation in helping to meet identified needs, in a sustainable location and confirms that the site remains available for development within the Plan period. The response provides further details on the scheme proposals and comment on the allocation and development brief work. In addition, the response comments on wider elements of the emerging Local Plan including the Plan period and the identified housing needs.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a large 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 key services and facilities and within walking distance of both Dunton Green and Bat and Ball train stations. The site lies fully within the Green Belt, although is considered to be grey belt land under national policy, due to the sites performance against Green Belt purposes A, B and D. The Footnote 7 Assessment identifies that the site is near to a SSSI and has potential heritage impacts and high archaeological potential, however given the size of the site this is considered appropriate to be addressed through the Development Brief work and as such does not alter the grey belt status of the site. The site is well contained with the M26 to the north, Otford Road to the east and the railway line to the west and therefore presents a logical extension to Sevenoaks Urban Area. The site does not lie within the National Landscape. Detailed contaminated land (due to former landfill and land use) and noise assessment (due to traffic noise) would be required for any future proposals on this site. Approximately a quarter of the site is subject to Flood Zone 3 and it is adjacent to an SSSI (Sevenoaks Wildlife Reserve/Gravel Pits) and any future scheme will need to be designed to respond to these constraints. The site
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	promoter will need to show through a site-specific Flood Risk Assessment that the proposed development will be safe for its lifetime, taking account of the vulnerability of its users. See the Level 2 SFRA site assessment for further details. The site also lies partly within a mineral safeguarding area, which would need further consideration. There are no other constraints which would make this site unsuitable. Therefore, due to its highly sustainable location, well contained nature and status as grey belt land, the site is considered suitable for development.
Availability	The site has been submitted to the call for sites 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?	Developable

Overall Conclusion	Developable (Years 6-10, 11+)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to Sevenoaks Urban Area and is considered to be suitable for allocation. The Development Brief work has assessed the site capacity and is considered capable of accommodating 1,500 residential units.
Allocated for	1,500 residential units
Regulation 19 (2026) Ref	ST4-7

MX/26/00010
Land east of London Road, Dunton Green, Sevenoaks



SITE DETAILS	
SHELAA Reference	HO/21/00289
Regulation 19 Reference	ST4-6
Regulation 18 2025 Reference	SEV19
Site Area (Ha)	13.48
Developable Area (Ha)	12.41
Brownfield / Greenfield	Brownfield
Planning History	None
Previous SHELAA Ref (2018)	HO61, HO70, MX50
Site Description	This is a greenfield site adjacent to the settlement boundary of Sevenoaks Urban Area. The site comprises a parcel of land between London Road and the railway line, containing open fields and an area of ancient woodland. The site is bound by London Road to the west, the M26 motorway to the north, the railway line to the east and residential development to the south. Mature trees line the northern and eastern boundaries. A public right of way runs through the site from London Road. There is currently no vehicular access to the site.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	289 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to 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	Dunton Green Recreation Ground – Amenity Greenspace and Play Area Young People and Children	
Proposed use / designation	No	
Green Belt	Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints – limited capacity	
National Landscapes	Within 100m buffer of Kent Downs National Landscapes	
Landscape Sensitivity	Medium – 99.72%	
Agricultural Land Quality	Grade 3 – 91.01%	
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	Partially within Ancient Woodland (7.91%)	
Presence of Heritage Assets	Within 200m of 2 listed buildings	
Contamination Issues	Contaminated Land Assessment (former land use)	
Noise Pollution	Noise Assessment (rail and M26)	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Requires new access	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 400m of Sevenoaks	
Town and Local Centres	Access point within 800m of Dunton Green. Access point within 2km of Riverhead.	
Train Station	Within 800m of Dunton Green	

GREEN	AMBER	RED
12	12	3

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response was received from Natural England, highlighting that the site lies within the setting of the Kent Downs National Landscape, and referring to overarching advice on development in the setting of National Landscapes.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Dunton Green Parish Council</u> A response from Dunton Green Parish Council supports the proposed allocation of SEV19, on the basis that the Parish Council's own land, adjacent to the site, be submitted and utilised to aid in community and infrastructure improvements for this site. The response also sets out some specific comments on the proposed Development Brief for SEV19. <u>Riverhead Parish Council</u> A response from Riverhead Parish Council raising concerns regarding the cumulative impact of development in Dunton Green, in particular citing infrastructure concerns and the size of Dunton Green as a community. In addition, the response highlights concerns regarding the local wildlife reserve, biodiversity and habitats.
Other Consultation Bodies	<u>The Woodland Trust</u> A response from The Woodland Trust highlights an area of Ancient Semi/Natural Woodland, Nine Horse Wood, adjacent to the northern boundary of the site, as well as a thin strip of deciduous woodland along the western boundary. The response recommends redrawing the boundary of the site to exclude areas of ancient woodland and suggests a 50m buffer to be maintained. The response also notes the Ancient Tree Inventory (ATI) and recommends an expert survey to complete this across any sites allocated.

	<u>Kent Wildlife Trust</u> A response from Kent Wildlife Trust sets out that the cumulative impact of proposed site allocations to the north of Sevenoaks would result in the Wildlife Reserve and SSSI being effectively enclosed by built development. The specific development of this site would likely result in the loss of foraging and nesting sites for species which are also known to breed and utilise habitats within the SSSI and that given the scale of the proposed development, it is unlikely that suitable habitat could be provided to mitigate this loss, reducing the available habitat and impacting on the population size and health of species within the SSSI. <u>CPRE Kent</u> A response from CPRE Kent highlights the site's location within the Green Belt and partial Ancient Woodland constraints. The response also includes specific queries on the SHELAA 2025 conclusion that the only constraint for this site is access, rather than highlighting landscape sensitivity, Green Belt and Ancient Woodland.
General Response	Respondents raised concerns that the proposed development would exacerbate congestion on London Road, nearby junctions and local lanes, strain rail services, utilities, schools and healthcare without confirmed expansion plans for infrastructure, and increase pollution from traffic, noise, dust and light. Loss of irreplaceable Green Belt, ancient woodland and agricultural land is seen as undermining landscape character, settlement separation and wildlife habitats adjacent to SSSI sites, with insufficient buffers or biodiversity net-gain measures. Responses assert that flood zones 2 and 3 coverage, vague SuDS proposals and impacts on the River Darent floodplain appear at odds with national policy. Air quality management areas and inadequate pedestrian, cycle and public transport links are highlighted, while calls for binding infrastructure delivery, transparent funding and detailed ecological assessments underline unresolved risks.
Key topics raised	Transport, access and junction capacity Local services and utilities capacity Green belt, landscape character and settlement separation Biodiversity, SSSI adjacency and ecological connectivity Flood risk, hydrology and SuDS Air quality and AQMA considerations Construction and operational nuisance Ancient woodland and tree protection

SITE PROMOTER RESPONSE

Berkeley Strategic

A response from Berkeley Strategic, as the site promoted, confirms that they continue to actively promote the site for development and that all landowners involved are supportive of the ongoing promotion. The response provides further detail on the site specifics such as regarding site size, developable area, phasing and access.

Dunton Green Parish Council

A response from Dunton Green Parish Council submitted additional land for inclusion in the wider scheme, to include community facilities as part of the wider proposal.

SHELAA 2026 CONCLUSIONS

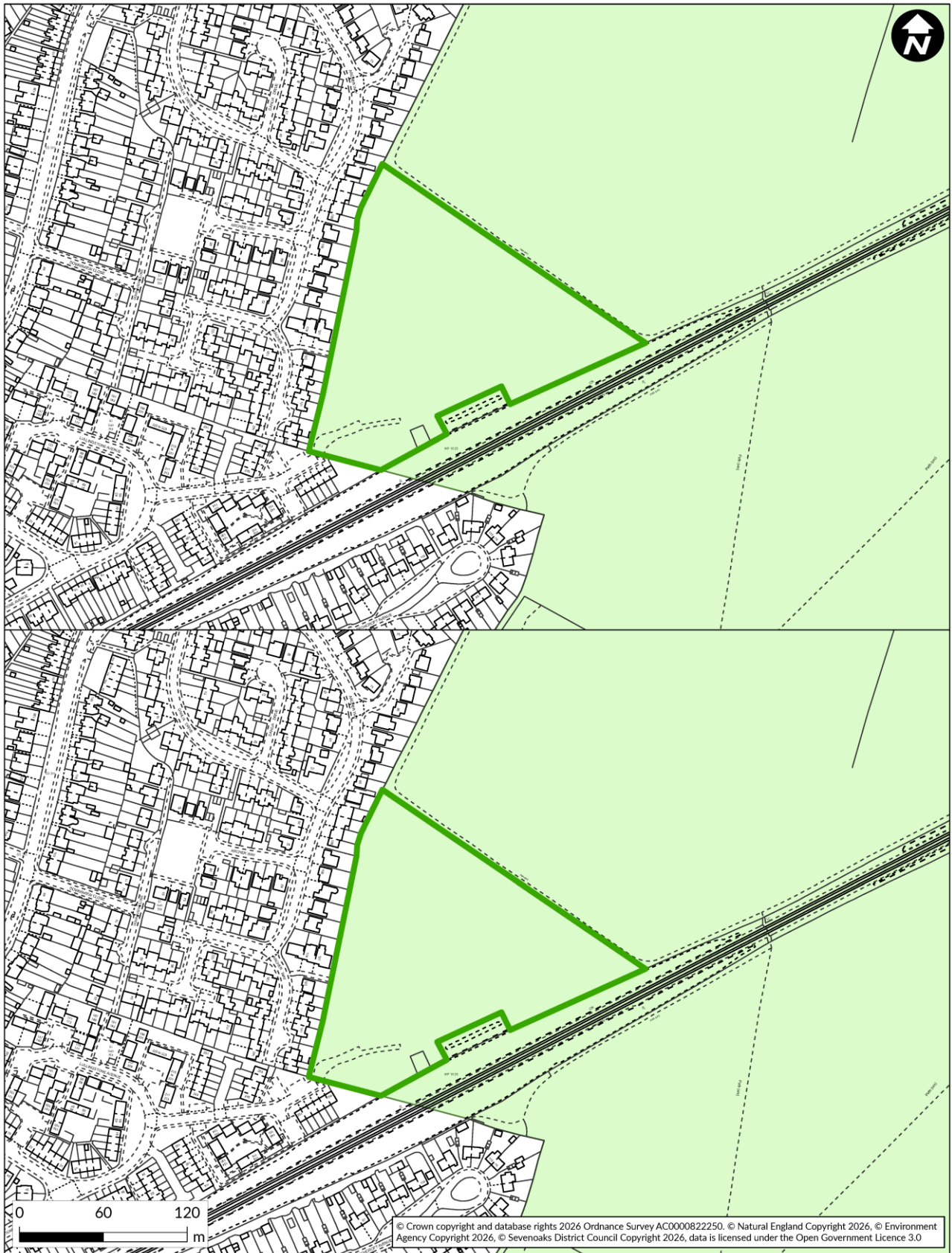
Suitable?

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 key services and facilities and within walking distance of Dunton Green Train Station. The site lies fully within the Green Belt, however is considered to be grey belt land under national policy, due to the sites performance against Green Belt purposes A, B and D. The Footnote 7 Assessment has identified that the site contains and small area of ancient woodland and is near to a Designated Heritage Asset, although these are considered to have a limited impact and therefore do not alter the grey belt status of the site. The site does not currently have a vehicular access and so a new access would need to be provided, as well as a secondary access for emergency use, although it is noted that the adjacent site, promoted by the Parish Council, may unlock access options. Consideration also needs to be given to the limited capacity on the surrounding transport network. A detailed tree survey should accompany any planning application and this will need to include the presence of ancient and/or veteran trees. Responses regarding the partial citing of Ancient Woodland within the site, and adjacent Ancient Woodland, are noted and these will be addressed through the Development Brief work in line with required buffers for this constraint. There are no other constraints which would make the site unsuitable. The concern raised by CPRE Kent regarding the SHELAA 2025 conclusion on Green Belt, landscape sensitivity and ancient woodland is noted, and attention should be drawn to the

	SHELAA methodology document which sets out the criteria and consideration of each constraints. The SHELAA 2025 clearly notes these three constraints, however these are not considered to be a 'showstopper' (red) constraint, in accordance with the methodology. Whilst consultation responses regarding site constraints are acknowledge, including Green Belt classification and urban sprawl concerns, adjacent Ancient Woodland and impact on the surrounding road network, further consideration of these suggest there are not considered to be any overriding constraints for this site which would make it unsuitable for the development proposed. Importantly, there were no overriding objections or concerns raised by statutory consultees, including Natural England, The Environment Agency, Historic England and KCC Highways on this site and therefore, due to its highly sustainable location adjacent to the urban confines of a top tier settlement, grey belt status and its unconstrained nature, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Sevenoaks Urban Area, and is therefore considered to be sustainably located for key services and facilities, as well as for public transport options in Dunton Green. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 289 residential units.
Allocated for	289 residential units
Regulation 19 (2026) Ref	ST4-6

HO/21/00227
Land at Lullingstone Avenue, Swanley



SITE DETAILS	
SHELAA Reference	HO/21/00227
Regulation 19 Reference	ST4-8
Regulation 18 2025 Reference	SWAN13
Site Area (Ha)	2.6
Developable Area (Ha)	2.59
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO213
Site Description	This is a greenfield site adjacent to the urban confines of Swanley. The site comprises a parcel of land containing an agricultural field used for grazing. The site is bound by residential at Archer Way and Lullingstone Avenue to the west, open countryside to the north and east, and the railway line to the south. Mature trees line the boundary with the railway line. There is an existing access to the site from Lullingstone Avenue.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	81 residential units
SHELAA Conclusion	Suitable and Developable

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	In the Green Belt adjacent to Swanley	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium – 96.59%	
Agricultural Land Quality	Grade 2 – 95.4%	
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	No specific risk	
Noise Pollution	Noise Assessment (railway)	
Air Quality	No specific risk	
Mineral Safeguarding Area	51.4% within River Terrace Deposits	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Within 400m of Swanley	
Town and Local Centres	Within 2km of Hextable, Upper Main Road, Swanley – Town Centre and Swanley – Manse Parade.	
Train Station	Within 2km of Swanley	

GREEN	AMBER	RED
18	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, advising referral to overarching advice on development within the setting of National Landscapes. The response also highlights that, given the cumulative impact of proposed sites in the wider area, that a consideration of soil impacts is expected as well as having regard for NPPF Paragraph 187a and b, and 188 to demonstrate whether Best and Most Versatile Land is impacted, and if so, that no appropriate land of a lower quality is available and subsequently suitable. <u>National Grid Electricity Transmission (NGET)</u> A response from National Grid Electricity Transmission (NGET) in relation to the proximity of sites to NGET assets, highlighting that the nearby Kingsnorth Beddington DC Cable, which is in close proximity to this site, has been decommissioned.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Swanley Town Council</u> A response was received from Swanley Town Council, strongly opposing the proposed development on this site, citing significant concerns for the proposed high density of the site allocation, Grade 2 agricultural land, flooding issues and access as reasons for the objection. The response highlights that, should the development go ahead, a significantly lower density should be proposed, the potential for overlooking and loss of privacy should be considered and the suitability of a secondary access should be further considered.
Other Consultation Bodies	<u>Laura Trott MP</u> A response was received from Laura Trott MP which considers that the proposals for this site are unsuitable, citing access concerns, the protection of Grade 2 agricultural land and the cumulative impact of development on schools, roads, transport and medical facilities, as reasons for objection.

	<u>CPRE Kent</u> A response was also received from CPRE Kent, objecting to the proposed site allocation due to the loss of Grade 2 agricultural land, flooding concerns and conflict with the Swanley Neighbourhood Plan. The response also cites concerns regarding the grey belt assessment of Green Belt purposes A, B and D.
General Responses Summary	Respondents highlighted narrow and unsuitable access roads requiring new construction that could cause congestion, safety hazards and hinder emergency services. They emphasised the loss of grade 2 farmland would undermine food security and remove a green buffer preventing urban sprawl. Local schools, healthcare facilities, utilities and sewage systems lack capacity and clear upgrade plans. Development would increase surface-water runoff in high flood-risk zones without deliverable SuDS or sewer improvements. The site's ecological value, including habitats for protected species and biodiversity corridors, may not be fully offset by mitigation. Public transport and active-travel links are inadequate to reduce car use, increasing emissions and traffic. There is a need for lower density and stronger landscape buffers to protect settlement edges and visual amenity. Prolonged construction would cause noise, dust and traffic disruption, and transparent evidence and robust consultation are required.
Key topics raised	Highways, access and construction traffic management Agricultural land designation and land use permanence Community infrastructure capacity Flood risk and surface-water drainage Ecology, habitats and biodiversity net gain Public transport, active travel and climate impacts Landscape, settlement edge and design density Noise, residential amenity and construction impacts

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 the site promoter, confirms the ongoing availability of the site and support for the emerging allocation as included in the Regulation 18 consultation. The response also includes wider commentary on the Regulation 18 consultation proposals and further site-specific details in relation to this site.

SHELAA 2026 CONCLUSIONS

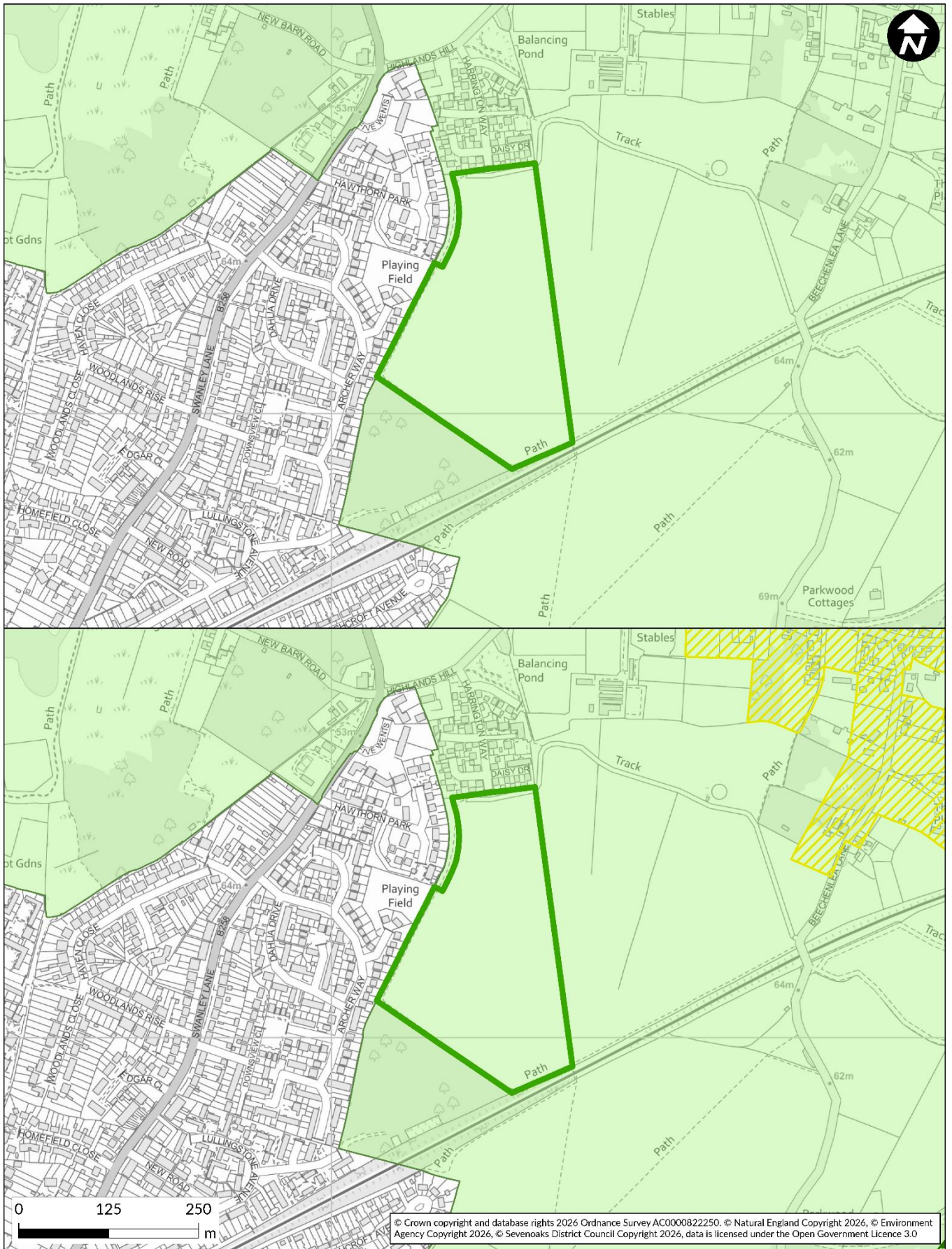
Suitable?

This is a greenfield site situated adjacent to the urban confines of Swanley, which is identified as a Town in the Settlement Hierarchy 2025, and therefore is considered to be a sustainable location. The site is close to existing key services and facilities, including being within 2km of 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 performance against Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken, and these are not considered to apply to this site. The site is majority Grade 2 Agricultural Land Quality, which requires further consideration and sensitive masterplanning and design, but this is not considered to be a reason to find the site unsuitable. There is an existing access off Lullingstone Avenue, although this is privately owned, which could be used for a secondary emergency access, but it is considered that a new access is required. A noise assessment will also be required, due to proximity to the railway line. The response from National Grid highlights the presence of a decommissioned DC cable, and the Development Brief and any subsequent planning application should include a strategy for responding to the NGET cable route present within/close proximity to the site, which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design. Responses cite concerns regarding site-specific flooding issues, which are noted. These are not considered to be a reason for restricting development in its entirety, however appropriate mitigation measures should be provided as part of a detailed planning application and address these localised issues. The Strategic Flood Risk Assessment Level 2 also identifies surface water flood issues on this site and it is considered the site could be developed if the site-specific guidance, as set out in the site sheet is followed, taking a sequential approach to locating buildings out of areas of surface water flood risk, as well as careful consideration of access and egress in relation to the railway line. Responses highlight concerns regarding the proposed density of the site and this has been explored further through Development Brief work, resulting in a significant reduction in proposed site capacity for this site. Whilst consultation responses regarding site constraints are acknowledged, including Grade 2 Agricultural Land quality and Green Belt classification, there are not considered to be any overriding constraints for this site which would make the site

	unsuitable for the development proposed. Importantly, there were no overriding objections or concerns raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these natural environment constraints and therefore, due to the unconstrained nature of the site, its grey belt status and its location adjacent to the urban confines of Swanley, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Swanley, and is therefore considered to be sustainably located for key services and facilities in Swanley and Hextable, as well as for public transport options in Swanley. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 65 residential units.
Allocated for	81 residential units
Regulation 19 (2026) Ref	ST4-8

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



SITE DETAILS	
SHELAA Reference	HO/21/00165/B
Regulation 19 Reference	ST4-10
Regulation 18 2025 Reference	Part of SWAN14
Site Area (Ha)	6.98
Developable Area (Ha)	6.98
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	139 residential units
SHELAA Conclusion	Suitable and Developable

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	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
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	Not within vicinity of heritage asset	
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	Within 400m of Swanley	
Town and Local Centres	Over 2km from a town or local centre	
Train Station	Over 2km from a train station	

GREEN	AMBER	RED
14	9	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 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.
Key Issues Raised	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.

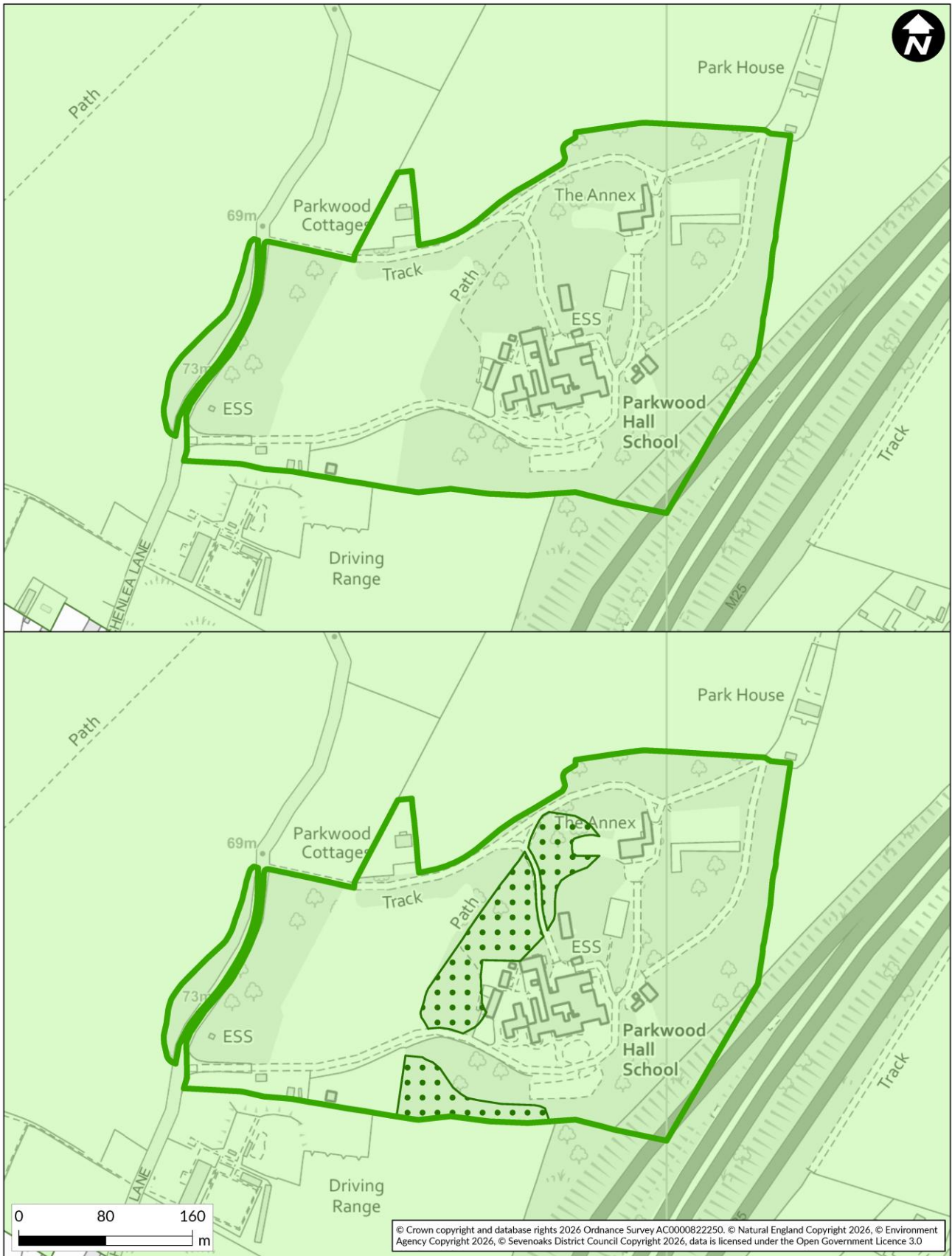
SHELAA 2026 CONCLUSIONS

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, although it is noted that the site is over 2km from an allocated town or local centre and a 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. A Footnote 7 assessment highlights that the site is near to a designated heritage assets, although this is
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	expected to be addressed through the Development Brief work and therefore does not alter the grey belt status of the land. The site is Grade 2 Agricultural Land Quality, but this on its own is not considered an overriding constraint. The amended boundary for this site brings the site further away from the Swanley Village Conservation Area, and maintains the separation between Swanley Town and Swanley Village. The site would require a new access. 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 and therefore, due to its unconstrained nature, sustainable location and grey belt status, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Swanley and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and considers it capable of accommodating 139 residential units.
Allocated for	139 residential units
Regulation 19 (2026) Ref	ST4-10

MX/21/00042
Parkwood Hall Co-operative Academy, Beechenlea Lane, Swanley



SITE DETAILS	
SHELAA Reference	MX/21/00042
Regulation 19 Reference	ST4-11
Regulation 18 2025 Reference	SWAN12
Site Area (Ha)	13.82
Developable Area (Ha)	12.36
Brownfield / Greenfield	Partially Brownfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This is a large partially brownfield site on the edge of Swanley. The site comprises a number of buildings in educational use and associated hardstanding, playing pitches and an area of woodland. The site is bound by open countryside to the north and south, the M25 to the east and Beechenlea Lane to the west. The site benefits from an existing access off Beechenlea Lane.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	100 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within 400m buffer of Swanley
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Not within urban confines	
Land Use (GF/PDL)	Partially PDL	
Existing use	Yes but to be reprovided	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt adjacent Swanley	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Other (72.67%), Grade 2 (26.47%)	
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	10.57% within Ancient Woodland	
Presence of Heritage Assets	Impact on Non Designated Heritage Asset within the site	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment – traffic noise	
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 – improvements would be required	
Settlement Classification	Adjacent Swanley	
Town and Local Centres	Within 800m of Swanley, Manse Parade Within 2km of Swanley Town Centre	
Train Station	Within 2km of Swanley	

GREEN	AMBER	RED
16	11	0

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 National Landscape as well as overlapping with a parcel of Ancient Woodland, which is an irreplaceable habitat.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Swanley Town Council</u> A response from Swanley Town Council remains openminded about this proposal, but objects primarily on road cess at Beechenlea Lane. The response does support the redevelopment of the school, particularly supporting SEN needs and would be happy to engage in discussions about access to this development.
Other Consultation Bodies	<u>The Woodland Trust</u> A response from The Woodland Trust highlights 3 small areas of Ancient Woodland within the site boundary and recommends redrawing the site boundaries to exclude this.
General Response	Respondents highlight severe vehicular access constraints via narrow Beechenlea Lane with weight limits, pinch points and few passing places, which worsen congestion, air pollution and damage to local roads. Capacity constraints in schools, health services and utilities may be strained by 165 new homes amid limited public transport. Increased traffic would endanger pedestrians, cyclists and horse riders on roads lacking pavements or lighting and could undermine the setting of Swanley conservation area and listed buildings. The site overlaps ancient woodland and veteran trees, risking habitat loss without strict tree protection, habitat buffers and drainage improvements to prevent flooding. Closure of Parkwood Hall risks reducing essential SEN provision despite suggestions for a new facility, while the loss of best and most versatile agricultural land could

	harm food security. Procedural issues include unreadable transport maps, unclear land covenants and the need for more inclusive consultation.
Key issues raised	Highways & Vehicular Access Public services, utilities and social infrastructure capacity Pedestrian, cycle and horse-rider safety (active travel) Heritage, conservation area and listed building setting Biodiversity, trees and ancient woodland Special educational needs provision (SEN) Agricultural land quality and food security (BMV) Flood risk and surface water drainage

SITE PROMOTER RESPONSE

Iceni Projects on behalf of Parkwood Hall Co-operative Academy

A response from Iceni Projects on behalf of Parkwood Hall Co-operative Academy, as the site promoter, provides further site detail with respect of this proposal. The response reconfirms support for the sites inclusion in the Regulation 18 consultation and reaffirms the sites availability for allocation within the Plan period. Further information is provided on site proposals as well as wider commentary on the Local Plan Regulation 18 consultation documents, including the development strategy and emerging policies.

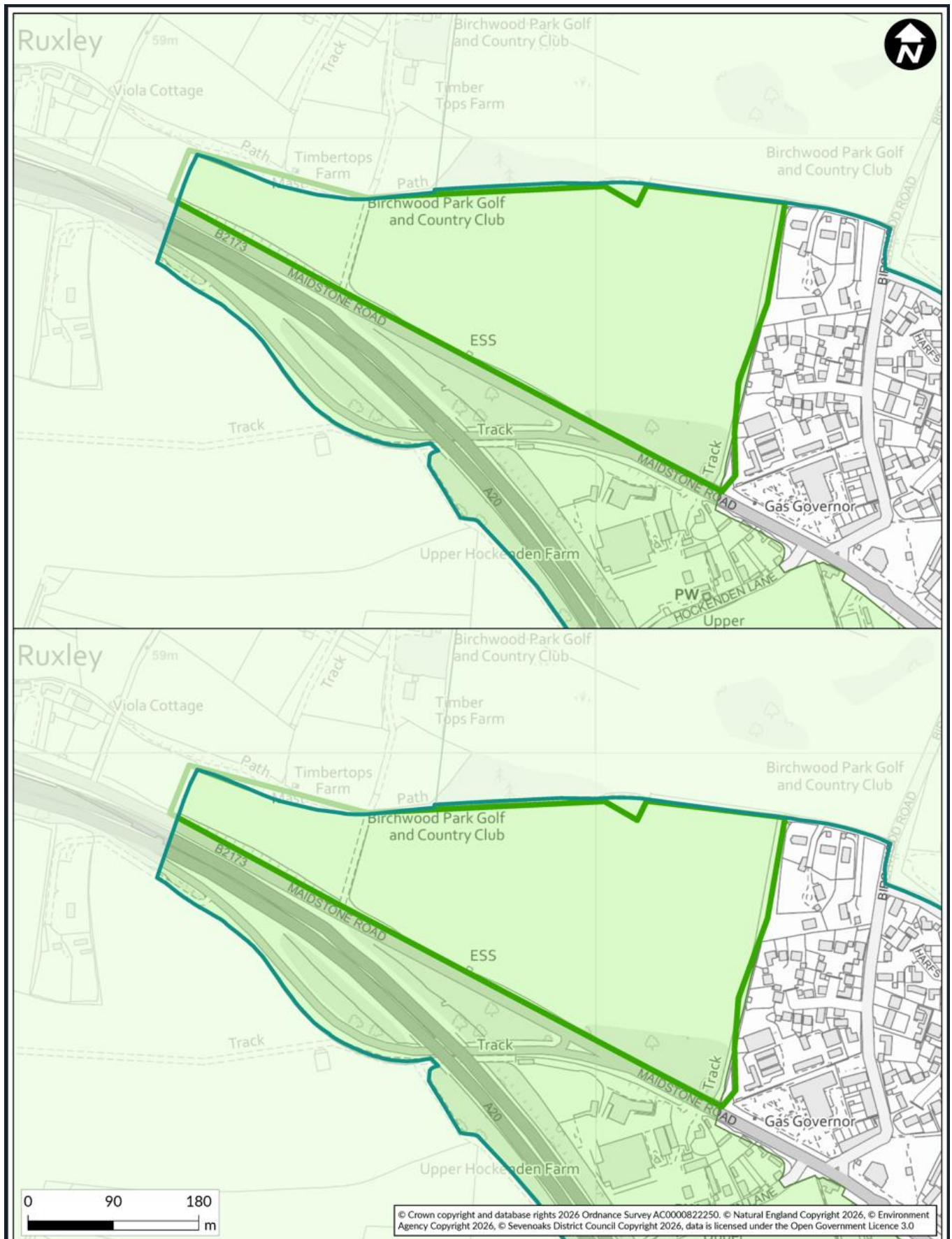
SHELAA 2026 CONCLUSIONS

Suitable?	This is a partially brownfield site within close proximity to the urban confines of Swanley, which is identified as a town in the Settlement Hierarchy 2025, although it is noted that the site is not directly adjacent to the urban confines boundary. 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 partial PDL status and performance against Green Belt purposes A, B and D. The site is partially Grade 2 Agricultural Land Quality, which would require further consideration. The capacity of the surrounding road network, particularly Beechenlea Lane would require consideration. The site does not lie within National Landscapes. A noise assessment would be required due to the sites proximity to the M25. There are no other constraints which would make this site unsuitable and therefore, due to its unconstrained nature, sustainable location
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	and grey belt status, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Swanley and is considered suitable for allocation. The Development Brief work has assessed capacity of the site and it is considered capable of accommodating 100 residential units.
Allocated for	100 residential units
Regulation 19 (2026) Ref	ST4-11

MX/26/00004
Land North of Maidstone Road, Swanley



SITE DETAILS	
SHELAA Reference	MX/26/00004
Regulation 19 Reference	ST4-12
Regulation 18 2025 Reference	SWAN11
Site Area (Ha)	10.87
Developable Area (Ha)	10.87
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 Swanley, north of Maidstone Road. The site is currently in agricultural use and is bound by Maidstone Road to the south, agricultural to the north and west, and residential to the east. The site has an existing access off Maidstone Road.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	277 residential units
SHELAA Conclusion	Suitable and Developable

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 allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium – 97.51%	
Agricultural Land Quality	Grade 2 – 98.13%	
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 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	Contaminated Land Assessment (former land use)	
Noise Pollution	Noise Assessment (commercial and highway)	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvement may still be sought)	
Settlement Classification	Adjacent Swanley	
Town and Local Centres	Within 2km of Swanley – Town Centre	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
15	8	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>Swanley Town Council</u> A response from Swanley Town Council sets out concerns regarding the sites location adjacent to London Borough of Bexley and the potential for urban sprawl from Greater London. The response also highlights significant concerns regarding congestion and the impact on highways, and makes suggestion for highways upgrades should the site move forward to allocation.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent suggests that this site be reassessed in relation to Green Belt purposes A, B and D. <u>Laura Trott MP</u> A response from Laura Trott MP sets out concerns that the site does not meet grey belt criteria due to its location adjacent to London Borough of Bexley, concerns regarding highways and congestion as well as the cumulative impact of development on infrastructure such as schools, roads, transport and medical facilities.
General Response	Respondents highlight that the proposed SWAN11 development could overwhelm the local highway network and site access, increasing congestion on Maidstone Road, Birchwood Corner and London Road and raising safety and pollution concerns. They note that narrow residential streets, limited pavements and a lone pedestrian crossing hinder traffic flow and cyclist and pedestrian safety. Respondents also state that the site's prime green belt farmland, hedgerows and natural buffers support wildlife and recreation, and their loss would harm landscape character, settlement separation and food production. Local GP, dental and hospital services are described as operating at or beyond capacity, with no evidence of new healthcare facilities to meet extra demand. Education capacity is said to be insufficient, with local schools and pre-school places at or near full

	occupancy and unclear plans for expansion or transport links to alternative providers. Public transport provision is deemed inadequate, with limited bus services, crowded peak-time trains and no commitments to enhance sustainable travel options. Flood risk concerns are raised due to the site's propensity to flood and the absence of a detailed drainage strategy. Some respondents question the scale of employment land against the council's own economic needs, while wider infrastructure deficits—utilities, parking, community facilities and road safety—are seen as unaddressed, prompting calls for funded junction improvements, drainage mitigation and broader social and transport infrastructure before development proceeds.
Key issues raised	Highway network capacity and site access Green Belt, agricultural land and landscape character Health services and emergency care capacity Education capacity and school provision Biodiversity, recreational uses and community assets Public transport and sustainable travel provision Flood risk and surface-water drainage Employment land quantum and deliverability (B2/B8)

SITE PROMOTER RESPONSE

Iceni Projects on behalf of Consilium Land Ltd

A response from Iceni Projects on behalf of Consilium Land Ltd supports the proposed site allocation and reaffirms that the site is capable of making a meaningful contribution to the identified housing need over the Plan period and is sustainably located on the edge of Swanley.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt 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 key services and facilities in Swanley, and is also well located for public transport, being within 2km of Swanley train station. The site lies within the Green Belt, but is partially recommended for release in combination through the Stage 2 Green Belt assessment. The site is considered to constitute grey belt land under national policy, due to its partial PDL status and its performance against Green Belt purposes A, B and D. An assessment of NPPF
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	Footnote 7 constraints has been undertaken and it is noted that the site is near to a designated heritage asset. However, the impact is considered to be limited and therefore the site constitutes grey belt. The site is majority Grade 2 Agricultural Land Quality which would need further consideration. Due to the sites proximity to the strategic road network, contaminated land, noise and air quality assessments are required. It is also considered that the current access to both parcels are not sufficient and so new access, including emergency access, would be required. There are no other constraints which would make the site unsuitable and therefore, due to the sustainable location adjacent to a top tier settlement, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Swanley and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 277 residential units.
Allocated for	277 residential units
Regulation 19 (2026) Ref	ST4-12

MX/25/00011
Land north of Moultain Hill, Swanley



SITE DETAILS	
SHELAA Reference	MX/25/00011
Regulation 19 Reference	ST4-13
Regulation 18 2025 Reference	SWAN15
Site Area (Ha)	19.78
Developable Area (Ha)	19.78
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	This site comprises a large parcel of greenfield land adjacent to the urban confines of Swanley. The site is bound by the railway line to the north and west, open countryside to the north Beechenlea Lane to the east and residential development and Downsview Primary School to the south.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	370 residential units
SHELAA Conclusion	Suitable and Developable

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 allocation / designation	No	
Proposed use / designation	No	
Green Belt	Adjacent to Swanley	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
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 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	Potential to impact on setting of Conservation Area	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment – adjacent to railway	
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	Within 400m of Swanley	
Town and Local Centres	Within 800m of Swanley – Town Centre and Swanley - Manse Parade	
Train Station	Within 2km of Swanley	

GREEN	AMBER	RED
17	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, advising referral to overarching advice on development within the setting of National Landscapes. The response also highlights that, given the cumulative impact of proposed sites in the wider area, that a consideration of soil impacts is expected as well as having regard for NPPF Paragraph 187a and b, and 188 to demonstrate whether Best and Most Versatile Land is impacted, and if so, that no appropriate land of a lower quality is available and subsequently suitable.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Swanley Town Council</u> A response was received from Swanley Town Council, strongly opposing the proposed development on this site, citing significant concerns regarding transport access and the increased risk to pedestrians on the surrounding road network, urban sprawl towards Swanley Village, Grade 2 agricultural land and perceived danger of rugby pitches adjacent to the railway, as reasons for refusal. The response sets out that, should the development go ahead, the Town Council would encourage the provision of a community hall rather than the proposed rugby pitches and that the ambition to ensure a significant amount of green and recreational space in the development is supported. Additionally, the Town Council would encourage restricting access to the northern part of Beechenlea Lane to be cycle/pedestrian use only.
General Response	Respondents highlight that Site SWAN15 lacks suitable highway access and limited road capacity, with narrow lanes and no pavements, which could increase congestion, rat-running and safety risks. The site occupies grade 2 farmland, raising concerns over local food security and loss of green belt buffers. Air quality

	and noise levels may worsen during construction and with more vehicles, affecting respiratory health and trapping pollutants. Local schools, GP surgeries, utilities and drainage systems are seen as operating at capacity with no confirmed expansion plans. Development could fragment habitats, harm biodiversity, damage heritage assets in the conservation area and exacerbate flood and surface water risk owing to inadequate drainage infrastructure. Additional points include parking pressures, reliance on private cars, contested site classification and calls for improved consultation.
Key topics raised	Highway access and traffic capacity Best and most versatile (BMV) agricultural land Air quality, noise and public health Public services and utilities capacity Green Belt function and settlement separation Biodiversity and habitat protection Heritage, conservation area and built environment impacts Flood risk and surface water drainage

SITE PROMOTER RESPONSE

Pro Vision on behalf of Cooper Estates Strategic Land (CESL) Ltd

A response from Pro Vision on behalf of Cooper Estates Strategic Land (CESL) Ltd confirms support for this emerging allocation and highlights that the site promoter remains committed to delivering development on this site within the plan period, considering the site suitable and deliverable. The response also highlights the importance of the contents of each Development Brief prepared for site allocations being deliverable, reasonable and informed by up-to-date information.

SHELAA 2026 CONCLUSIONS

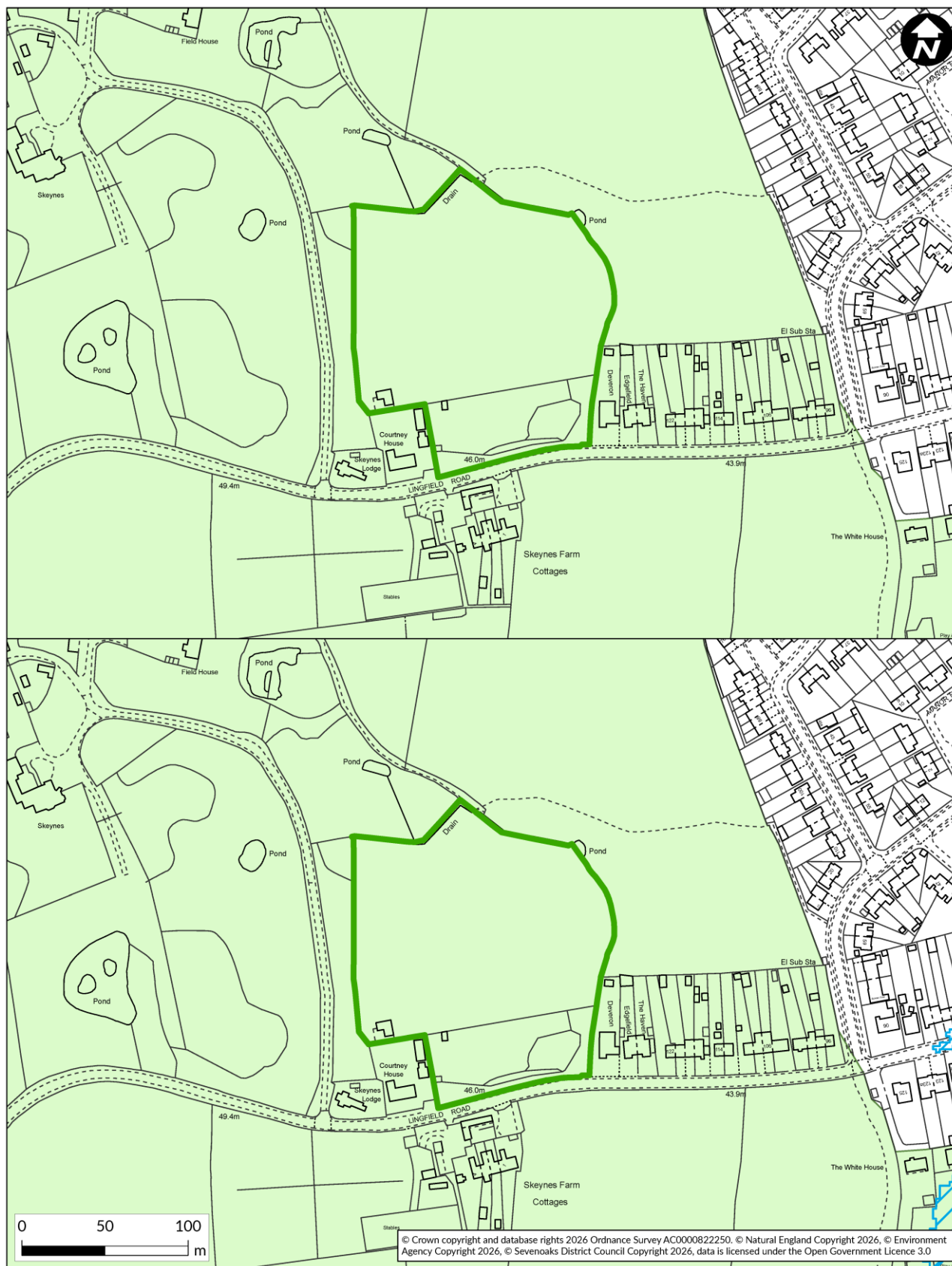
Suitable?	This is a greenfield site adjacent to the urban confines of Swanley, which is classified as a Town in the Settlement Hierarchy 2025, and therefore the site is considered to be within a sustainable location, close to key services and facilities, including being within 2km of Swanley train station. 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. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that the site is
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	near to a Designated Heritage Asset, However, the impact is considered to be limited and therefore the site is considered to be grey belt. The majority of the site is Grade 2 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 assessment would be required on this site due to the proximity to railway. Whilst consultation responses regarding site constraints are acknowledged, including Grade 2 Agricultural Land quality, Green Belt classification and urban sprawl concerns, there are not considered to be any overriding constraints for this site which would make the site unsuitable for the development proposed. Importantly, there were no overriding objections or concerns raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these environmental constraints and therefore, due to the site's highly sustainable location and status as grey belt land, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Swanley and is therefore considered to be sustainably located for key services and facilities in Swanley, as well as for public transport options at Swanley Town. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 370 residential units.
Allocated for	370 residential units
Regulation 19 (2026) Ref	ST4-13

HO/21/00168

Land at Lingfield Road, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00168
Regulation 19 Reference	ST4-14
Regulation 18 2025 Reference	EDEN11
Site Area (Ha)	2.12
Developable Area (Ha)	2.12
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site in Edenbridge. The site comprises a large parcel of farmland. The site is bound by Lingfield Road to the south, residential to the east and west and agricultural land to the north, east and west. There is an existing access off Lingfield Road.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	62 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of 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	Completely within the Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – addressed through Development Brief	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Medium - High	
Agricultural Land Quality	Urban - 4.15%; Grade 3 - 95.85%	
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	New/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	100.0% within 400m of Edenbridge	
Town and Local Centres	Within 800m of Edenbridge, Central Area (walkable in 10 minutes)	
Train Station	Within 2km of Edenbridge Town Station (walkable and cycle friendly)	

GREEN	AMBER	RED
18	6	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 and High Weald National Landscape and advises that overarching advice on development in the setting of National Landscapes is referred to.
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 this site, citing Green Belt, access concerns, lack of visibility splay assessment, pedestrian access, the cumulative impact of development, the role of the site and insufficient information as reasons for objection. Without prejudice, the response sets out specific infrastructure requirements if the site is to be taken forwards.
Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP raises a specific query regarding the history of development proposals on nearby sites. <u>CPRE Kent</u> A response from CPRE Kent objects to this proposed site due to landscape sensitivity and raises specific queries regarding the site's assessment as grey belt in the Green Belt assessment.
General Response	Respondents identify severe constraints on highways and access, with narrow roads, blind bends, flooding and limited public transport likely to increase congestion and emissions. Surface and river flood risk and drainage capacity are already stretched, raising concerns about flood events. The site's Green Belt status and landscape setting, including wildlife habitats and views to the High Weald AONB, require stronger buffers and lower densities. Education, healthcare and emergency services lack capacity and funding, while water, wastewater and utility

	upgrades remain uncostered and without clear timing triggers. Archaeological remains and listed building settings risk loss without heritage safeguards. Biodiversity networks, hedgerows and protected species could be harmed by hard surfaces and untested measures. Design, density and infrastructure timing rely on non-binding language, and respondents call for enforceable obligations, clear delivery timetables and updated assessments before allocation.
Key issues raised	Highways, access and traffic capacity Flood risk and surface water management Green Belt, landscape and settlement edge Education, healthcare and emergency services and capacity Biodiversity and ecological networks Utilities, wastewater and water supply capacity Heritage and archaeology Design, density and delivery phasing

SITE PROMOTER RESPONSE

Henry Adams on behalf of Wates Development

A response from the site promoter confirms that the site is available for allocation in the Local Plan and supports the proposed allocation at Regulation 18 consultation, under the reference EDEN11.

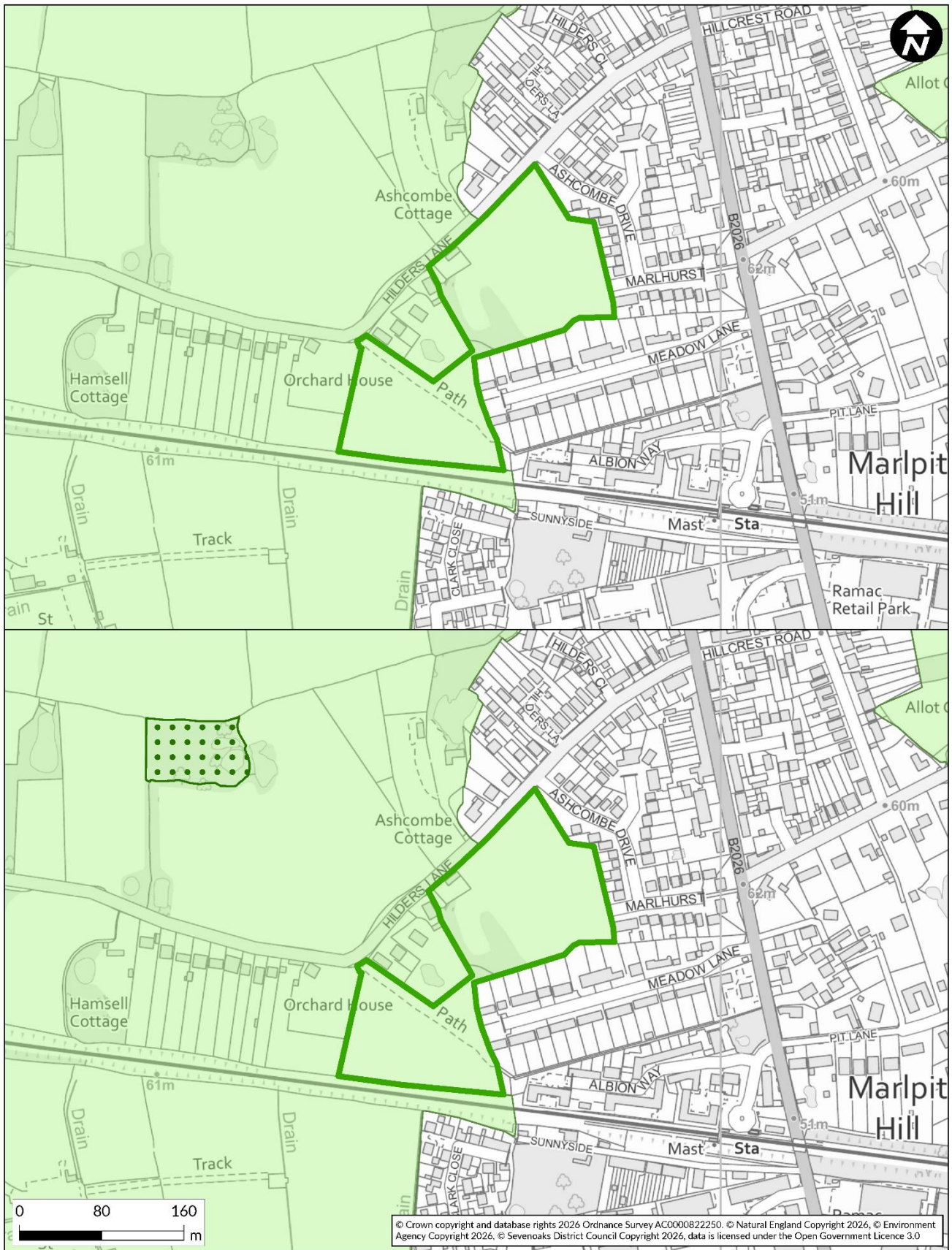
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to Edenbridge, 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 in Edenbridge, including two train stations. The site does not directly border the urban confines of Edenbridge; however, it is adjacent to site EDEN10 (HO/21/00228), which is also considered suitable through this SHELAA. 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. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that the site is near to a Designated Heritage Asset. However, it is considered that this can be addressed through the emerging Development Brief work and therefore the site is considered to constitute grey belt. The site
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	does not lie within national landscapes but is medium-high landscape sensitivity which will require further consideration. Whilst public consultation responses regarding site constraints are acknowledged, including the Green Belt and landscape sensitivity, amongst others, there are not considered to be any overriding constraints for this site which would make the site unsuitable for the development proposed. Importantly, there were no overriding objections or concerns raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these natural and historic environment concerns. There are also concerns raised regarding surrounding infrastructure, including access and the local pedestrian access. These concerns are noted, and these will be dealt with through the Development Brief work and Infrastructure Delivery Plan, where possible, and a detailed planning application. There are no other constraints which would make this site unsuitable and therefore, due to its sustainable location, grey belt status and relatively unconstrained nature, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Edenbridge and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 62 residential units.
Allocated for	62 residential units
Regulation 19 (2026) Ref	ST4-14

HO/21/00226
Land west of Ashcombe Drive and Meadow Lane, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00226
Regulation 19 Reference	ST4-15
Regulation 18 2025 Reference	EDEN8
Site Area (Ha)	3.29
Developable Area (Ha)	3.29
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO191
Site Description	This is a greenfield site located adjacent to the settlement boundary of Edenbridge. The site comprises two linked parcels to the west of Edenbridge, currently used for grazing. The site is bound by Hilders Lane to the north, residential development to the east and west and the railway line to the south. A Public Right of Way intersects the southern parcel from south-east to north-west.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	93 residential units
SHELAA Conclusion	Suitable and Developable

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	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-high	
Agricultural Land Quality	Grade 3 – 93.42%	
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 3 listed buildings	
Contamination Issues	No specific risk	
Noise Pollution	Noise Assessment (railway)	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Access difficult	
Network Capacity	No capacity on transport network	
Settlement Classification	Within 400m of Edenbridge	
Town and Local Centres	Access point within 2km of Edenbridge, Central Area and Edenbridge, Northern Fringe	
Train Station	Within 800m of Edenbridge, within 2km of Edenbridge Town	

GREEN	AMBER	RED
16.5	6.5	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 falls within the setting of the High Weald National Landscape and advises that overarching advice on development in the setting of National Landscapes is referred to, as well as the cumulative impact of adjacent sites. Additionally, the response highlights that the site contains a Public Right of Way and refers to paragraph 105 of the NPPF.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Edenbridge Town Council</u> A response from Edenbridge Town Council supports the site in principle, subject to appropriate density, a detailed access strategy, retention of trees and hedgerows, provision of play space and green infrastructure, high-quality design, highways and infrastructure mitigation, connectivity improvements and sustainable urban drainage.
Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP highlights concerns regarding the impact of this proposed site on the junction of B2026 Main Road, Hilders Lane and Hillcrest Road crossroads. <u>CPRE Kent</u> A response from CPRE Kent objects to this proposed site due to landscape sensitivity and considered the site to be strongly performing Green Belt, and not grey belt land.
General Response	Narrow rural roads such as Hilders Lane and the B2026 lack footpaths, visibility splays and tested junction improvements, making them unsafe for additional traffic. Heavy rain causes meadow flooding west of Ashcombe Drive, clay subsoils limit soakaways, and wastewater networks risk overflows without confirmed sewer upgrades. Water supply, sewage capacity,

	schools and healthcare services are at or near capacity with no secured S106/CIL contributions for enhancements. Bus and train services are infrequent, stations lack disabled access and no active travel corridors or crossing standards are specified. A high-density scheme on greenfield land would erode the rural edge, Green Belt and heritage settings without a landscape-led masterplan or biodiversity net gain targets. Obligations, standards and funding mechanisms remain undefined, creating uncertainty over deliverability.
Key issues raised	Highways access and junction safety Flood risk, surface water drainage and wastewater capacity Community infrastructure and utilities capacity Public transport, accessibility and active travel provision Landscape character, Green Belt, settlement edge and heritage Site capacity, masterplanning and design standards Biodiversity, protected species and tree protection Clarity of obligations, standards and deliverability evidence

SITE PROMOTER RESPONSE

DHA Planning on behalf of Fernham Homes Operation Ltd

A response from DHA Planning on behalf of Fernham Homes Operation Ltd confirms support for the proposed site allocation and reconfirms the availability of the site. The response also provides deliverability details and further comment on the emerging Development Brief for the site.

SHELAA 2026 CONCLUSIONS

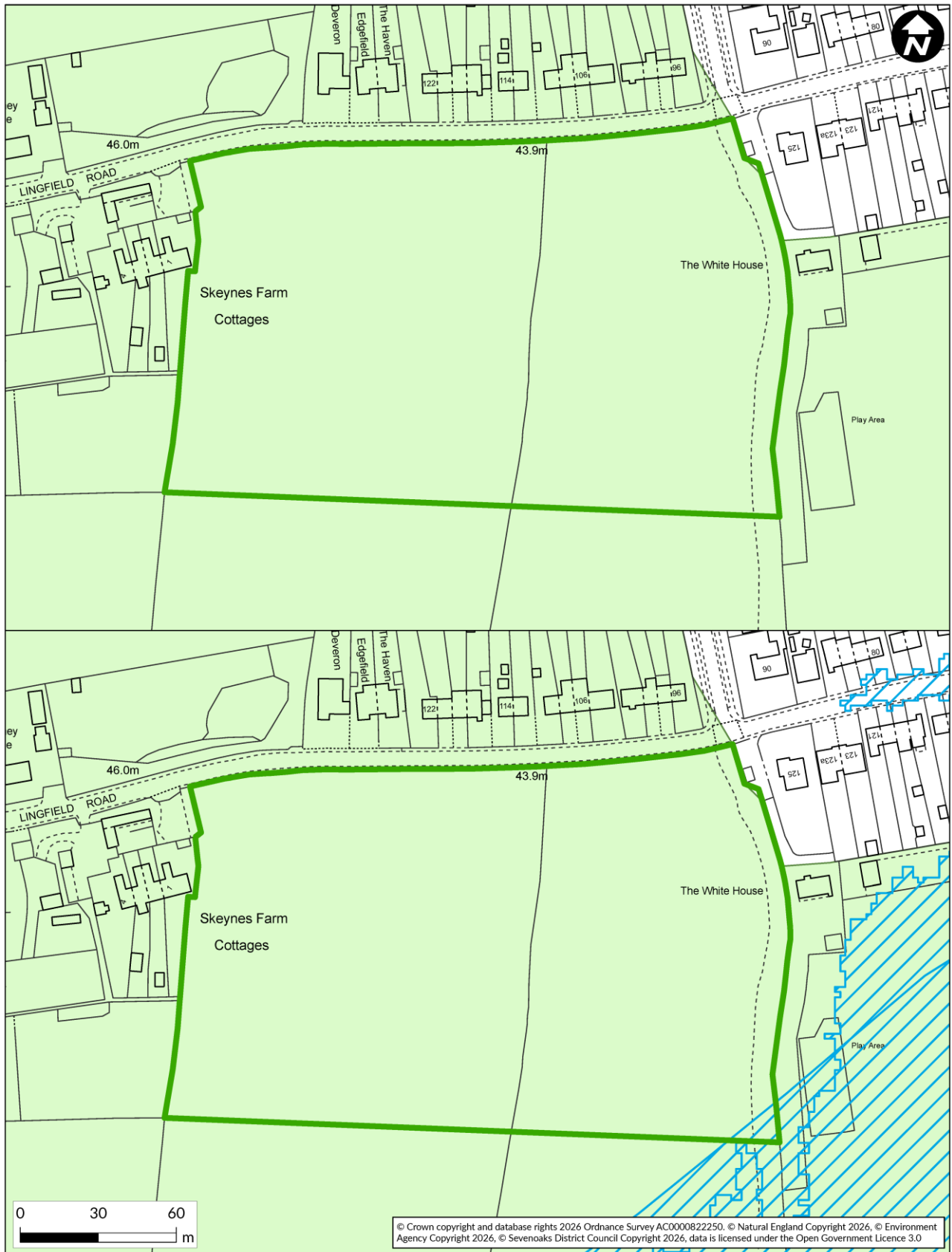
Suitable?	This is a greenfield Green Belt site situated adjacent to the urban confines of Edenbridge, which is identified as a Town in the Settlement Hierarchy 2025, and therefore is considered to be in a sustainable location. The site is close to existing key services and facilities in Edenbridge Town, including access to two train stations, on different lines. The site lies fully within the Green Belt, however is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that the site is near a Designated Heritage Asset. However, the impact is considered to be limited and therefore this site is considered to constitute grey belt. Whilst public consultation responses regarding site constraints are acknowledged, including the Green
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	Belt and landscape sensitivity, amongst others, there are not considered to be any overriding constraints for this site which would make the site unsuitable for the development proposed. Importantly, there were no overriding objections or concerns raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these natural and historic environment concerns. Consultation responses regarding density, retention of trees and hedgerows and design, as well as specific infrastructure requests such as play space, green infrastructure, highways mitigation, connectivity improvements and drainage systems are noted, and these will be dealt with through the Development Brief work and Infrastructure Delivery Plan, where possible, and a detailed planning application. 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. Capacity on the surrounding road network also needs consideration. There are no other constraints which would make the site unsuitable and therefore, due to the site's location adjacent to the urban confines of Edenbridge and its grey belt status the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Edenbridge and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 93 residential units.
Allocated for	93 residential units
Regulation 19 (2026) Ref	ST4-15

HO/21/00044

Land west of Lingfield Road Recreation Ground and East of Skeynes Farm Cottages, Lingfield Road, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00044
Regulation 19 Reference	ST4-16
Regulation 18 2025 Reference	EDEN13
Site Area (Ha)	3.19
Developable Area (Ha)	3.19
Brownfield / Greenfield	Greenfield
Planning History	No planning history – currently in agricultural use.
Previous SHELAA Ref (2018)	HO369
Site Description	This is a greenfield site comprising a parcel of land at the western edge of Edenbridge. It forms part of an agricultural holding and is bounded by Lindfield Road to the north, residential development to the east and west and open countryside to the south. The land is flat with a mature hedgerow lining the northern boundary.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	100 residential units
SHELAA Conclusion	Suitable and Developable

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 Urban Confines	
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 urban confines)	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 Constraint – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium – High (“0.98%) Medium (78.48%)	
Agricultural Land Quality	Urban (39.41%) Grade 3 (60.59%)	
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	Potential impact on Listed Buildings and Non Designated Heritage Asset	
Contamination Issues	Contaminated Land Assessment (former farmland)	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Within River Terrace Deposits	
Site Access	New/additional access required	
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 and Edenbridge, Southern Fringe Within 2km of Edenbridge, Northern Fringe	

Train Station	Within 2km of Edenbridge Town Station	
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GREEN	AMBER	RED
16.5	9.5	1

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 Landscape and advises that overarching advice on development in the setting of National Landscapes is referred to, as well as noting the potential cumulative impact of adjacent sites. <u>The Environment Agency</u> A response from The Environment Agency highlights that the south corner of this site lies within Flood Zone 2, with partial surface water flooding. It is set out that there is historic flooding recorded on the southeastern corner of the site and that development must be supported with a Flood Risk Assessment (FRA) which must demonstrate the flood risk to the site can be managed to an acceptable level. It is expected that any potential layout follow the sequential approach by placing vulnerable forms of development within the areas at least risk of flooding and keeping the high risk areas as open space. Due to proximity to a main river a Flood Risk Activity Permit (FRAP) may be required.
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 this site, citing Green Belt, a lack of defensible boundaries, access concerns, hedgerows and rural frontages, the cumulative highways impacts and insufficient supporting information as reasons for objection.

Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP raises a specific query regarding the history of development proposals on nearby sites. <u>CPRE Kent</u> A response from CPRE Kent objects to this proposed site due to urban sprawl, the PRoW network, flooding concerns and considered the site to be strongly performing Green Belt, raising specific queries about the sites assessment as grey belt in the Green Belt assessment.
General Response	Respondents raise concerns over highways access and parking safety, noting congestion on Lingfield Road and narrow C-class routes, absence of site-specific traffic assessments and pedestrian and cyclist risks at pinch points. Frequent surface water and groundwater flooding, limited drainage capacity and sewage overload are highlighted without a robust surface water strategy. Loss of Green Belt and best agricultural land is criticised in the absence of exceptional circumstances, while mineral safeguarding and contaminated land assessments are missing. Public transport is constrained by infrequent buses, non step-free stations and limited rail capacity. Local schools, healthcare and emergency services are at or beyond capacity. Ecology and protected species may suffer without thorough surveys. Lack of landscape analysis risks settlement edge erosion. Water supply and wastewater systems are deemed under-resourced without funded upgrades.
Key issues raised	Flood risk, surface water and drainage Green Belt, agricultural land quality, minerals and safeguarding Public transport connectivity and station accessibility Local social and community infrastructure capacity Ecology, biodiversity and habitat protection Landscape, visual impact, settlement edge and recreation ground Sewage and potable water capacity

SITE PROMOTER RESPONSE

Strutt and Parker on behalf of Obsidian Strategic

A response from Strutt and Parker, acting on behalf of Obsidian Strategic, as the site promoter confirms that the site is available and that the proposed allocation is supported in the Local Plan. However, the response does highlight that the allocated site represents a small portion of a wider site proposal and submits that the wider site be capable of accommodating additional units through an allocation. The response submits additional evidence regarding the wider site.

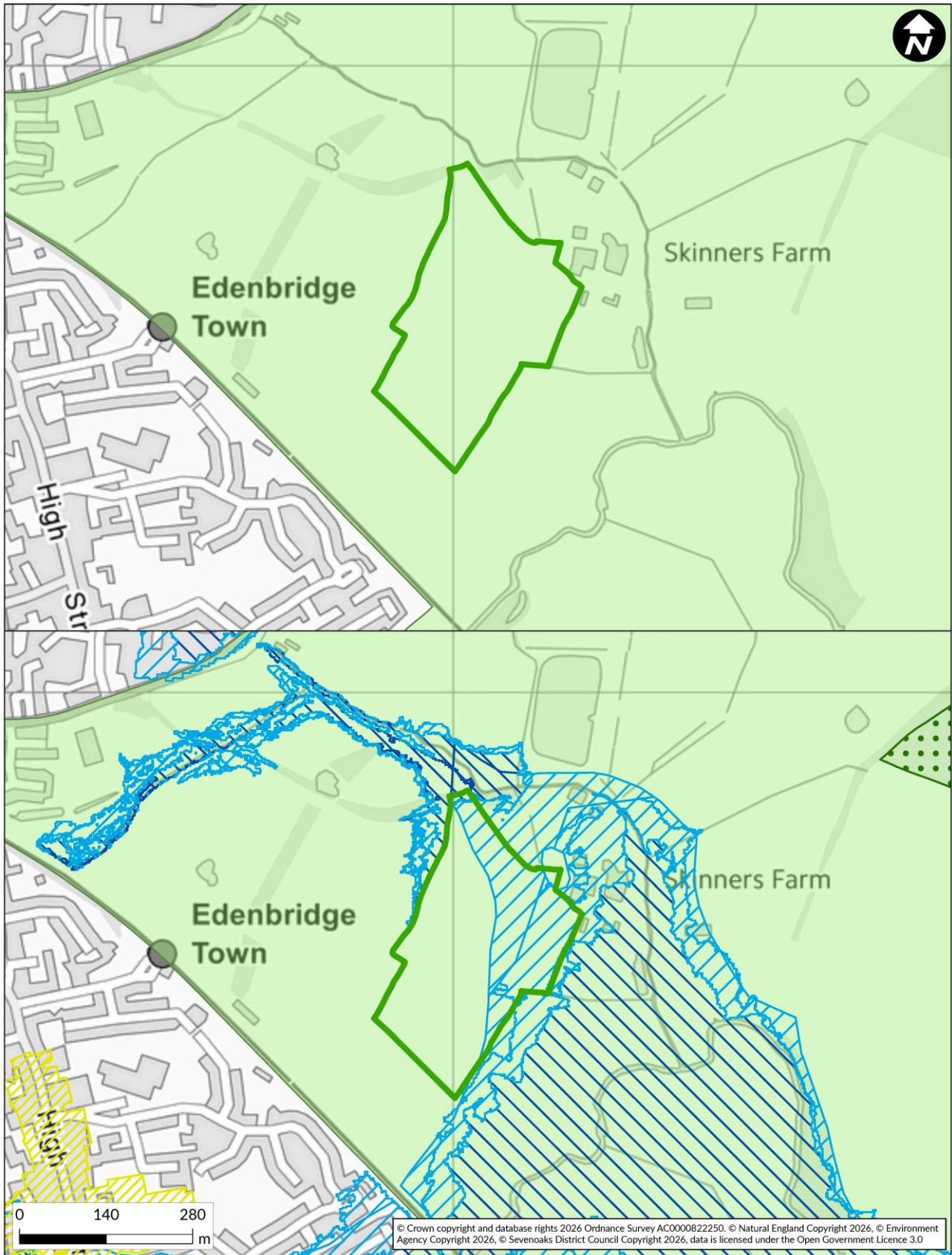
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site located adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy 2025. The site is therefore considered to be located sustainably, close to key services and facilities, including 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. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that the site is near to a Designated Heritage Asset and has high archaeological potential, however this is considered to have a low impact and accordingly the site is considered to constitute grey belt land.. The site does not lie within National Landscapes. The site does lie within a Mineral Safeguarding Area and would require a contaminated land assessment should a proposal come forward on this site, both of which will require further information. Whilst public consultation responses regarding site constraints are acknowledged, including the Green Belt, flood risk, hedgerows and rural frontages, amongst others, there are not considered to be any overriding constraints for this site which would make the site unsuitable for the development proposed. Importantly, there were no overriding objections raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these natural and historic environment concerns. However, comments from The Environment Agency are noted and any development proposal should be designed in line with the sequential test. A Flood Risk Assessment will be required at planning application stage and a FRAP may be required due to the proximity to the nearby river. It is considered that the site could be developed if site specific guidance as set out in the site sheet (SFRA Level 2) is followed, taking a sequential approach to locating buildings out of areas of flood risk. There were also concerns raised regarding surrounding infrastructure, including site access and the cumulative impact on highways. These concerns are noted, and these will be dealt with through the Development Brief work and Infrastructure Delivery Plan, where possible, and a detailed planning application. A new access is required for this site. Due to the unconstrained nature of the site, and its sustainable location adjacent to a top tier settlement, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Edenbridge and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 100 residential units.
Allocated for	100 residential units
Regulation 19 (2026) Ref	ST4-16

HO/21/00232
Land south west of Skinners Farm, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00232
Regulation 19 Reference	ST4-17
Regulation 18 2025 Reference	EDEN12
Site Area (Ha)	8.31
Developable Area (Ha)	8.31
Brownfield / Greenfield	Greenfield
Planning History	'Land at Four Elms Road - South of Skinners Lane' - adjacent land benefits from planning permission - 20/02998/OUT).
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site near to the urban confines of Edenbridge. The site comprises agricultural land. The site is bound by Skinners Farm to the east, Skinners Lane to the north, allotments to the south and agricultural land to the east, south and west.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	155 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of 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	Completely within the Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of footnote 7 constraints	
National Landscape	Not within National Landscape	
Landscape Sensitivity	80% Medium 20% Medium – High	
Agricultural Land Quality	Grade 3 - 100%	
Flood Risk	38.5% in Flood Zone 2 and 0.52% 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	Not within Ancient Woodland	
Presence of Heritage Assets	Within 200m of 1 listed buildings	
Contamination Issues	Cont Land Assessment (former/adjacent use)	
Noise Pollution	No specific risk	
Air Quality	Odour assessment	
Mineral Safeguarding Area	Partially within Mineral Safeguarding Area 38.44%	
Site Access	New/additional access required	
Network Capacity	No capacity on transport network	
Settlement Classification	56.35% within 400m of Edenbridge	
Town and Local Centres	Within 2km of Edenbridge, Central Area (walkable and cycle friendly)	
Train Station	Within 800m of Edenbridge Town Station (walkable in 10 minutes)	

GREEN	AMBER	RED
13	11	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 abutting Priority Habitats Investment – Deciduous Woodland and containing a Public Right of Way. The response provides further advice on the above.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Edenbridge Town Council</u> A response from Edenbridge Town Council supports the allocation only as part of a fully integrated northern development. The response highlights that the site is not suitable for independent allocation due to Green Belt status, flood risk, access, density and infrastructure and community facilities.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent objects to the proposed allocation, citing the definition of grey belt, adjacent allotments and public right of ways, landscape sensitivity and flood risk.
General Response	Respondents report concerns over highways, access and local road safety around Site EDEN12, noting narrow rural lanes, low-arched railway bridges, congested junctions and limited pedestrian routes. They warn of flood risk from developing land in flood zones 2 and 3, reduced Green Belt openness, loss of public footpaths, strain on education, healthcare, emergency services and utilities, and unreliable public transport and rail services. Respondents also highlight potential harm to biodiversity, unclear site capacity and masterplanning, and errors in consultation materials undermining the process.
Key issues raised	Highways, access and local road safety Flood risk and sustainable drainage (SuDS)

	Green Belt, landscape and public access Community infrastructure: education, health, emergency and leisure Public transport and rail capacity Biodiversity, habitats and ecological connectivity Utilities, wastewater and water supply Site capacity, layout, phasing and deliverability (masterplanning and obligations)
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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, as the site promoter, confirms support for the allocation in the Regulation 18 consultation, and reconfirms deliverability within the Plan period. The response also provides comment on the emerging Development Brief and Local Plan strategy.

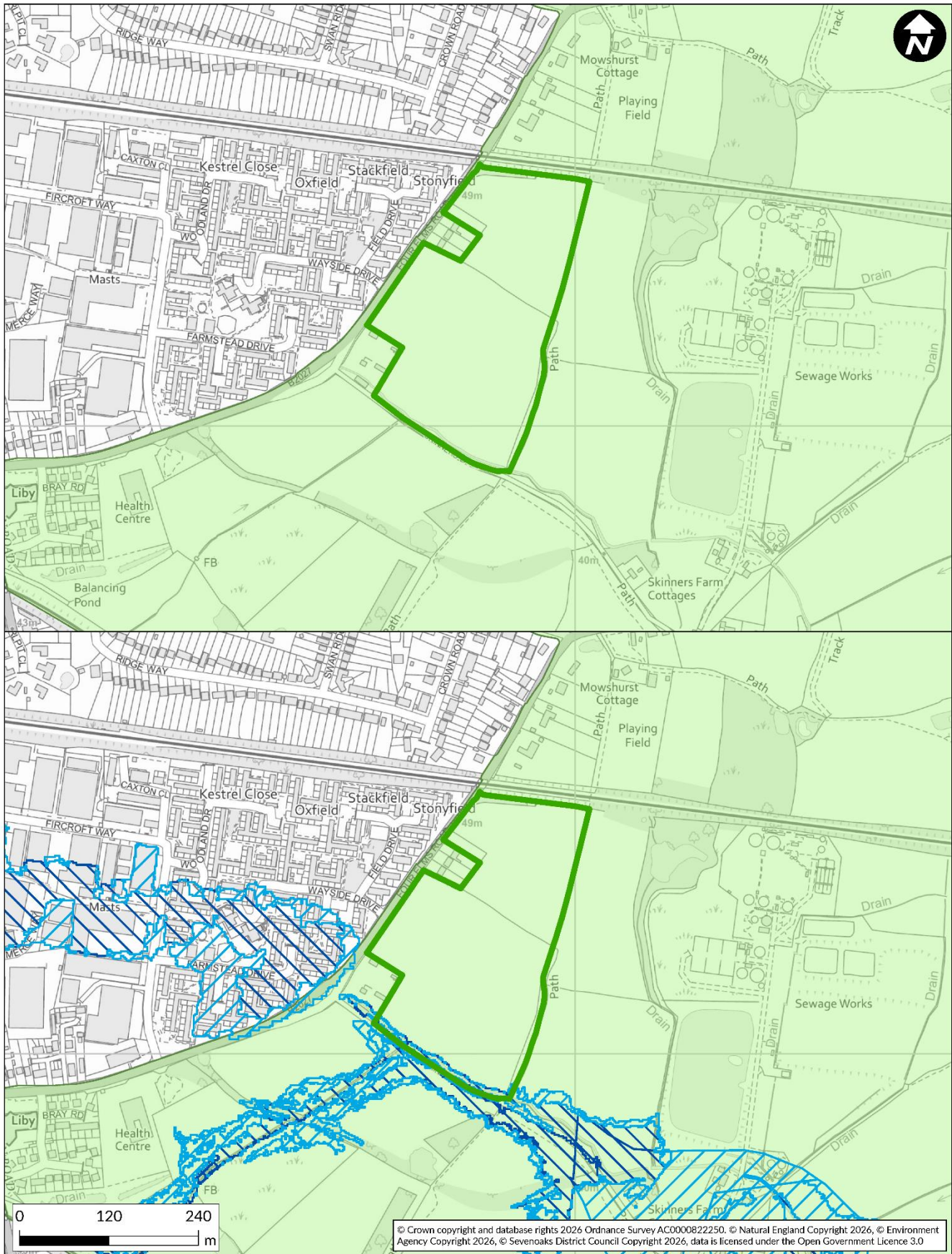
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy 2025. The site is therefore considered to be in a highly sustainable location, close to existing key services and facilities, including access to two train stations. The site is not directly adjacent to the settlement boundary, but it is adjacent to a site which benefits from outline planning permission (20/02998/OUT). The site has a number of constraints including medium landscape sensitivity, grade 3 agricultural land, approximately a third of the site is within flood zone 2 and there is need for odour and transport assessment, these would need further consideration. With regard to Flood Zone 3a, it is considered that the site could be developed where the site specific guidance in the 'site sheet' from the SFRA Level 2 is followed. The site also lies fully within the Green Belt, however it is considered a logical and contained extension to the town of Edenbridge and the site is considered to constitute grey belt land under national policy, due to its performance against Green Belt purposes A, B and D. The Footnote 7 assessment highlights the presence of Footnote 7 constraints, including Flood Zone 2 and potential heritage impacts. However, these are considered able to be addressed through the development brief work and therefore does not alter the grey belt status of the site. Due to
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	the sites sustainable location adjacent to a consented scheme, its grey belt status and the consideration of a logical and contained extension to Edenbridge, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to Edenbridge and is considered suitable for allocation. The Development Brief has assessed the capacity of the site and it is considered capable of accommodating 155 residential units.
Allocated for	155 residential units
Regulation 19 (2026) Ref	ST4-17

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



SITE DETAILS	
SHELAA Reference	HO/21/00233/B
Regulation 19 Reference	ST4-18
Regulation 18 2025 Reference	Part of EDEN9
Site Area (Ha)	9.59
Developable Area (Ha)	9.59
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	176 residential units
SHELAA Conclusion	Suitable and Developable

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	5.21m 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	
Footnote 7 Assessment	No footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-high – 98.6%	
Agricultural Land Quality	Grade 3 – 97.89%	
Flood Risk	0.69% Flood Zone 2 2.02% Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific 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	Not within a Mineral Safeguarding Area	
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
15.5	9.5	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.

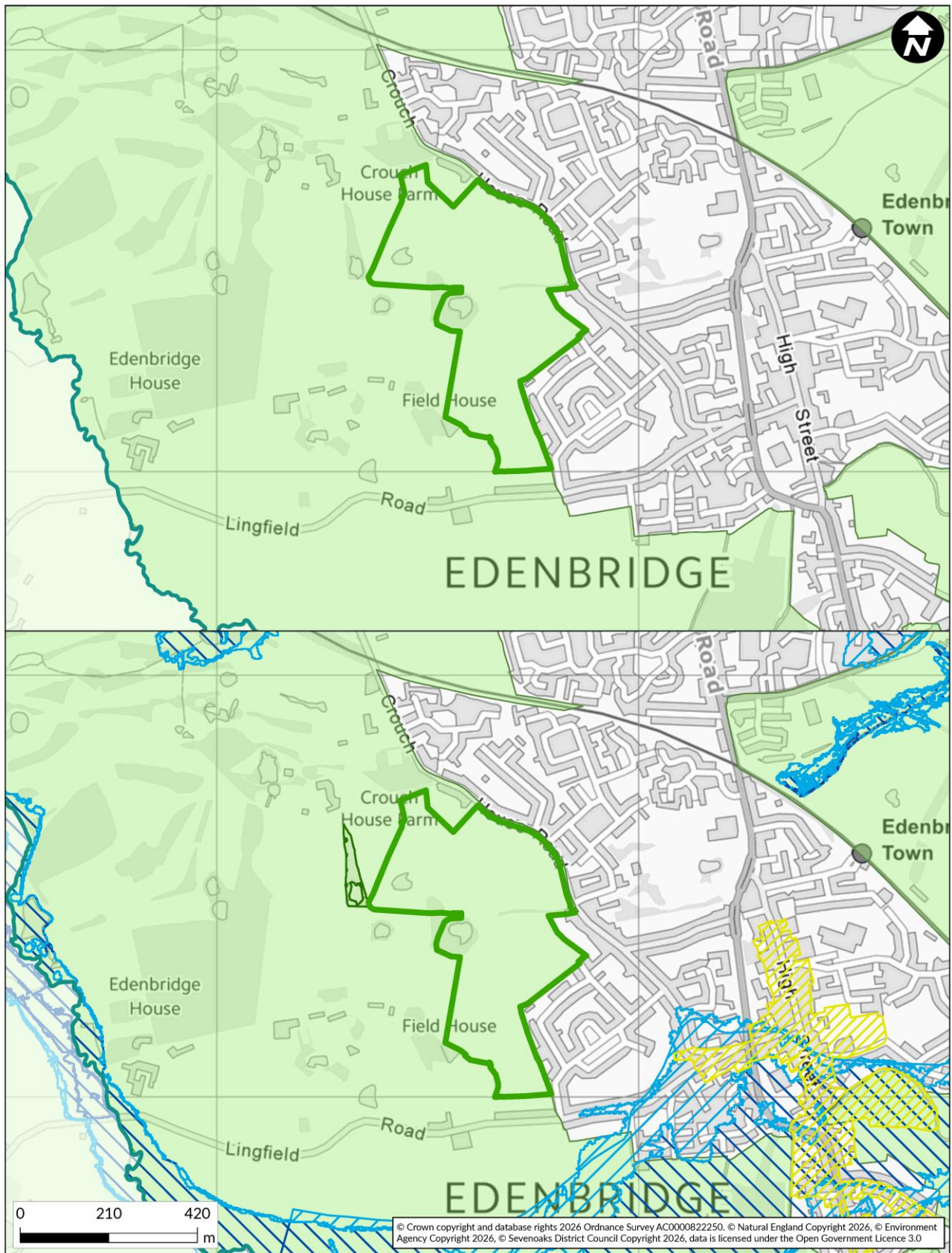
SHELAA 2026 CONCLUSIONS

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. An assessment of NPPF Footnote 7 constraints has been undertaken and these are not considered to apply to this site. Concerns received regarding odour have been taken account and as a result, the site area has been reduced to discount the element of the site closest to the sewage treatment works. The site does not have direct access and so a new access would be
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	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 no other constraints which would make the site unsuitable. Therefore, due to the unconstrained nature of the site and its location adjacent to a top tier settlement, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Edenbridge and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 226 residential units.
Allocated for	176 residential units
Regulation 19 (2026) Ref	ST4-18

HO/21/00228
Land at Crouch House Road, Edenbridge



SITE DETAILS	
SHELAA Reference	HO/21/00228
Regulation 19 Reference	ST4-19
Regulation 18 2025 Reference	EDEN10
Site Area (Ha)	18.23
Developable Area (Ha)	18.23
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	MX51
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, containing four agricultural fields separated by established hedgerows. Part of the land is used for grazing, with the remainder unused. The site is bound by Crouch House Road to and residential development to the north and east, residential development to the south and open countryside to the west.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	371 residential units (incl. 50 specialist)
SHELAA Conclusion	Suitable and Developable

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	Within Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – addressed through Development Brief	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium - High	
Agricultural Land Quality	Urban - 7.45% Grade 3 - 92.55%	
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	0.01% within Ancient and Semi-Natural 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	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 800m of Edenbridge, Northern Fringe Within 2km of Edenbridge, Southern Fringe	
Train Station	Within 2km of Edenbridge and Edenbridge Town	

GREEN	AMBER	RED
15	10	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 Landscape and advises that overarching advice on development in the setting of National Landscapes is referred to, as well as noting the potential cumulative impact of adjacent sites. The response also highlights that this site contains Priority Habitats Inventory – Deciduous Woodland and notes paragraph 192b of the NPPF, as well as a Public Right of Way, noting paragraph 105 of the NPPF.
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 this site, citing Green Belt, open countryside, flood risk, access concerns, cumulative impact of development, water and sewer infrastructure and C2 provision as reasons for objection. The response considers the site undeliverable, unjustifiable and contrary to the NPPF and Local Plan strategy.
Other Consultation Bodies	<u>The Woodland Trust</u> A response from The Woodland Trust suggests a boundary amendment to exclude areas of Ancient Woodland within this site and provides further guidance on The Ancient Tree Inventory, which may be incomplete for the area. <u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP raises a specific query regarding the history of development proposals on nearby sites. <u>CPRE Kent</u>

	A response from CPRE Kent objects to this proposed site due to landscape sensitivity and considered the site to be strongly performing Green Belt, and not grey belt land.
General Response	Respondents highlight that narrow country lanes such as Crouch House Road and Lingfield Road lack capacity and safety features for construction and long-term traffic. Public transport is infrequent, rail is single-track and overcrowded, and pedestrian and cycling routes are limited, likely increasing car dependency. Site soils and natural springs, together with an overcapacity drainage network, raise flood risk without clear sustainable drainage design or cross-site strategies. Water supply, wastewater and utility networks are reported as overstretched. Local schools, healthcare, emergency services and community facilities are seen as lacking capacity for further growth without a binding infrastructure phasing plan tied to housing delivery. Development within the Green Belt is viewed as risking harm to landscape character, heritage assets, ecological habitats and natural drainage buffers without defined design parameters, biodiversity net gain guarantees and enforceable mitigation. The absence of detailed transport modelling, hydrogeological assessments, viability testing and Grampian-style conditions is regarded as a serious omission in demonstrating sustainable infrastructure provision and environmental protection.
Key issues raised	Highway access, junctions and construction traffic Flood risk and surface water management Public transport, rail capacity and active travel Education, healthcare and community infrastructure Green Belt, landscape character and heritage setting Ecology, biodiversity and protected species Water supply, wastewater and utilities capacity Design parameters, phasing, viability, enforceable requirements

SITE PROMOTER RESPONSE

Henry Adams on behalf of Wates Development

A detailed response from the site promoter confirms that this site is available for allocation in the Local Plan and supports the proposed allocation at Regulation 18 (under site reference EDEN10).

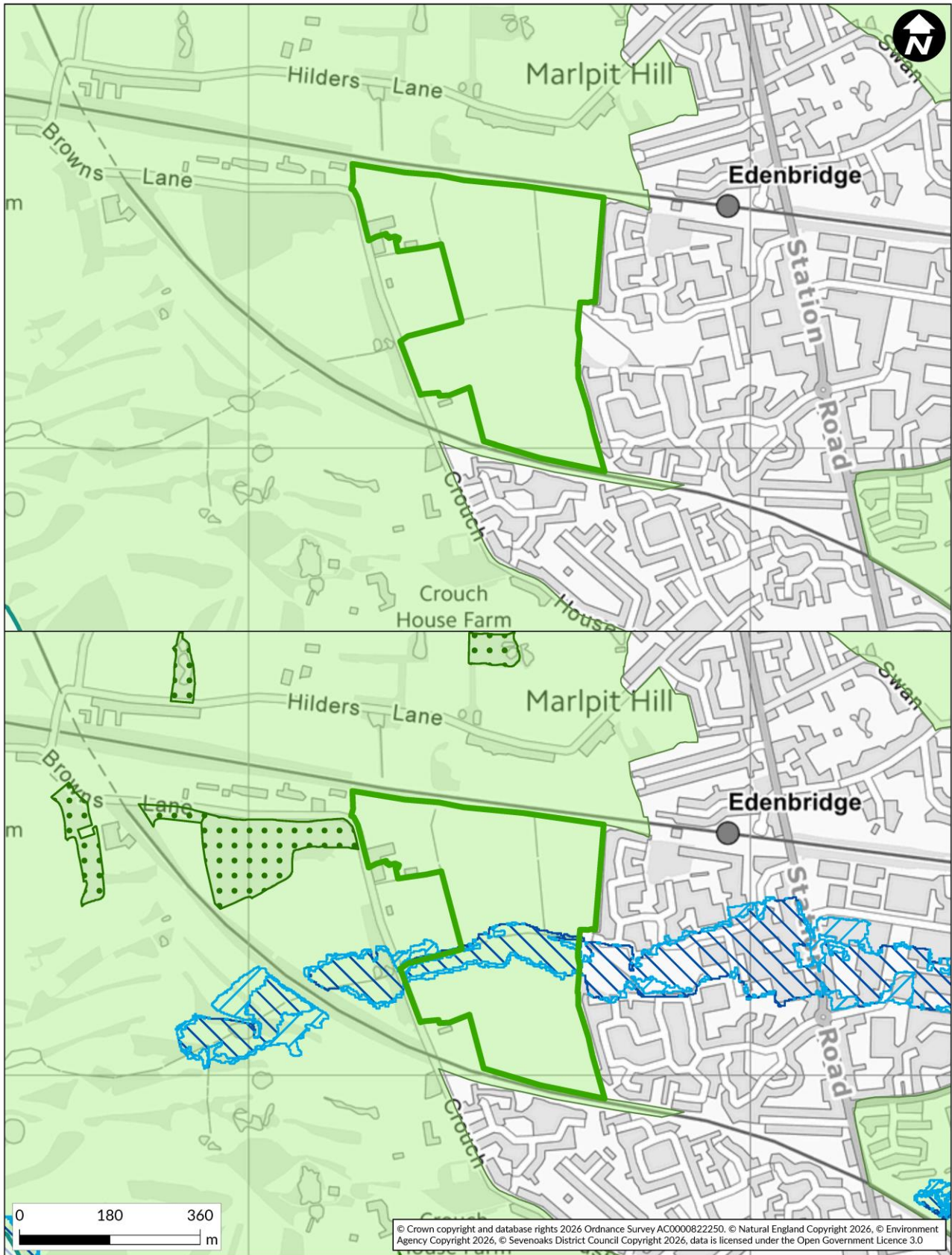
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Edenbridge, which is identified as a town in the Settlement Hierarchy 2025. The site is considered to be in a sustainable location, close to key services and facilities in Edenbridge, including to two train stations. The site lies fully within the Green Belt but is considered to constitute grey belt land under national planning policy, due to its performance against Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that there are potential heritage impacts on this site. However, it is considered that this can be addressed through the Development Brief work and therefore this site is considered to constitute grey belt. The site does not lie within the National Landscapes. The site is medium-high landscape sensitivity and partially within the buffer of Ancient Woodland which would require further consideration. A detailed tree survey should accompany any planning application and this will need to include an assessment of the presence of ancient and/or veteran trees. . Whilst public consultation responses regarding site constraints are acknowledged, including the Green Belt, Ancient Woodland and landscape sensitivity, amongst others, there are not considered to be any overriding constraints for this site which would make the site unsuitable for the development proposed. Importantly, there were no overriding objections or concerns raised by Statutory Consultees, including Natural England, The Environment Agency and Historic England on these natural and historic environment concerns. There are also concerns raised regarding surrounding infrastructure, including access and the local water and sewer infrastructure. These concerns are noted, and these will be dealt with through the Development Brief work and Infrastructure Delivery Plan, where possible, and a detailed planning application. In addition, consideration would need to be given to the current limited capacity on the surrounding transport network. Due to the unconstrained nature of this site, its grey belt status and its sustainable location adjacent to Edenbridge, this site is 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?	Developable
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Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Edenbridge and is therefore considered to be sustainably located for access to services and facilities and public transport options. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 321 C3 residential units and 50 C2 units (21 C3 equivalent).
Allocated for	321 C3 residential units and 50 C2 units
Regulation 19 (2026) Ref	ST4-19

MX/21/00009
Land at Breezehurst Farm, Crouch House Road, Edenbridge, Kent



SITE DETAILS	
SHELAA Reference	MX/21/00009
Regulation 19 Reference	ST4-20
Regulation 18 2025 Reference	EDEN14
Site Area (Ha)	17.93
Developable Area (Ha)	17.93
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO105, HO400, MX10
Site Description	The site comprises a large parcel of greenfield land in the Green belt adjacent to Edenbridge. There is a small element of brownfield land, in the form of an industrial park to the north-west of the parcel, included in the site boundary, which contains a number of workshops. The remainder of the site contains agricultural fields used for grazing, separated by trees and hedgerows. The site is bound to the north and south by railway lines, Crouch House Road and residential to the west, and residential to the east.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	450 residential units 1400 sqm of employment land
SHELAA Conclusion	Suitable and Developable

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)	Mixed – Greenfield and Previously Developed Land	
Existing use	Yes but will be reprovided	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt adjacent to Edenbridge	
Green Belt Stage 3	Grey Belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – significant impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium-high – 99.92%	
Agricultural Land Quality	Grade 3 – 75.81% Grade 4 – 24.19%	
Flood Risk	2.24% Flood Zone 2 9.36% Flood Zone 3	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Not in vicinity of heritage assets	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	Noise Assessment (rail and commercial)	
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 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	
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GREEN	AMBER	RED
13.5	10.5	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 and therefore refers the allocation to advice on site allocations within National Landscape settings. The response also notes that the site contains a Public Right of Way to the north of the site and advises that the allocation should have regard for paragraph 105 of the NPPF and emerging Policy T2 of the Local Plan.
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 site allocation, citing detailed explanations for key concerns regarding high Green Belt sensitivity, unresolved highways constraints, flood-risk concerns around St Brelade's Stream and the cumulative scale of development proposed.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent objects to the proposed site allocation, citing landscape sensitivity and strongly performing green belt as reasoning for concerns.
General Response	Respondents raise significant concerns over highways access, narrow lanes, low bridges and junction capacity, noting risks to emergency vehicle and HGV movement, congestion, collisions and pedestrian safety. Public transport is described as infrequent, overcrowded and car dependent, with limited bus services and non-accessible stations. Flood zones 2 and 3, surface water runoff, high water tables and deferred modelling prompt doubts over resilience and emergency access. Local healthcare, education, sewage and utilities are seen as operating

	at capacity without committed upgrades. The site's Green Belt location, landscape sensitivity and ecological value, including protected species and habitats, are cited as undermined by the proposed housing density, unclear masterplanning, floodplain open space and employment land. Policy wording, infrastructure phasing and governance arrangements are viewed as ambiguous and non-binding.
Key issues raised	Highways access, junctions and bridge constraints Public transport, rail and active travel connectivity Flood risk and surface water management Local services, utilities and community capacity Green Belt, landscape and settlement edge Biodiversity, protected species and ecological mitigation Density, masterplanning and developable area Employment land, HGV routing and amenity interactions

SITE PROMOTER RESPONSE

Rapleys on behalf of Breezehurst Farm Developments

A response from Rapleys on behalf of Breezehurst Farm Developments, as the site promoter, confirms support for the emerging Regulation 18 allocation and reaffirms the sites availability for development within the Plan period. The response also confirms details in the SHELAA 2025 as accurate. The response provides further site details and also detailed commentary on national policy, the emerging Local Plan, development strategy and policies.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a majority 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 key services and facilities and benefits from access to two train stations. The site lies fully within the Green Belt and is recommended for release through the Stage 2 Green Belt assessment. The site is considered to be Grey Belt under national policy. An assessment of NPPF Footnote 7 constraints has been undertaken and highlights that the site is adjacent to ancient woodland and Flood Zone 2 and 3. However, given the extent of the site these constraints are not considered to alter the status of grey belt for the site and can be addressed through the Development Brief work. The Strategic Flood Risk Assessment Level 2 identifies fluvial and surface
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	water flood issues on this site and it is considered the site could be developed if the site-specific guidance, as set out in the site sheet is followed, taking a sequential approach to locating buildings out of areas of fluvial and surface water flood risk. Due to being enclosed by hard boundaries, it is considered that this site would be a logical extension to the urban confines of Edenbridge. The site is fully Medium-High landscape sensitivity. Flood Zone 2 and Flood Zone 3 run through the centre of the site from east to west and this will need consideration following the publication of the emerging update to the Strategic Flood Risk Assessment (SFRA_ ahead of Regulation 19 publication. The site would require new access as well as emergency access. There is also limited capacity on the surrounding road network, which will need further consideration. There are no other constraints which would make the site unsuitable and therefore, due to the sites location adjacent to the urban confines of a top tier settlement, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to Edenbridge and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 450 residential units and 1,400 sqm of employment land.
Allocated for	450 residential units 1400 sqm of employment land
Regulation 19 (2026) Ref	ST4-20



SITE DETAILS	
SHELAA Reference	HO/25/00049
Regulation 19 Reference	ST4-21
Regulation 18 2025 Reference	NAG8
Site Area (Ha)	0.38
Developable Area (Ha)	0.38
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 New Ash Green. The site currently comprises an area of unused land with mature trees on site. The site is bound by residential and Church Road to the north, residential to the east and west and vacant land 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	14 residential units
SHELAA Conclusion	Suitable and Deliverable

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

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to New Ash Green	
Land Use (GF/PDL)	100% 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	
Footnote 7 Assessment	No Footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Urban (85.05%), Grade 3 (14.95%)	
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	Potential impact on setting of Non Designated 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 New Ash Green	
Town and Local Centres	Within 800m of New Ash Green, Village Centre Within 2km of Hartley, Cherry Trees	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
21	4	2

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 Parish Council</u> A response from Ash-cum-Ridley Parish Council highlights that this is a small site with very narrow access and raises concern for the visibility splay. The response makes reference to woodland on the southern part of the site and highlights the importance of pedestrian access to the site.
General Response	Respondents highlight that narrow rural lanes, restricted access points and lack of footpaths could increase traffic hazards, congestion and pollution, while limited cycle and bus links may reinforce car dependence. The tightly drawn green belt boundary is valued for preserving separation, local character and heritage landscapes. Development on site NAG8 could threaten orchards, ancient woodlands and protected habitats. Its location on Green Belt would trigger golden rule requiring 50% affordable housing. Local schools, GP services and community facilities already operate at capacity, and respondents stress that extra dwellings would overstretch these services without clear, enforceable funding and delivery plans. Concerns over design and alignment with the village's established architecture, as well as in relation to legal integration which centre on the lack of clarity around contributions to communal maintenance and covenants. Respondents call for detailed housing mix, density and tenure standards to ensure appropriate scale, affordability and compliance with green belt policies. Ecology and biodiversity impacts on red-list species and priority habitats are seen as significant, requiring rigorous protection measures. Governance issues underscore the need for transparent decision-making and a robust needs analysis to justify any allocation.
Key issues raised	Transport and highway safety

	Green Belt, landscape and settlement boundary Public services and community infrastructure capacity Design, character and legal integration with the village Infrastructure funding, delivery and enforceability Housing mix, density and affordability Ecology, woodland and biodiversity Parking standards and car dependence
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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 New Ash Green, which is a Primary Service Centre 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. A new access would be required. The site is greenfield Green Belt land but is considered to constitute Grey Belt land under national policy, due to its performance against Green Belt purposes A, B and D. The Footnote 7 Assessment confirms that there are no constraints applicable to this site. There are no other constraints which would make the site unsuitable. Due to the unconstrained nature of this site and its location adjacent to the settlement boundary of New Ash Green, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of New Ash Green and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 14 residential units.

Allocated for	14 residential units
Regulation 19 (2026) Ref	ST4-21

HO/21/00032
Grosvenor Church Road Hartley Longfield Kent DA3 8DZ



SITE DETAILS	
SHELAA Reference	HO/21/00032
Regulation 19 Reference	ST4-22
Regulation 18 2025 Reference	NAG5
Site Area (Ha)	0.52
Developable Area (Ha)	0.52
Brownfield / Greenfield	Greenfield
Planning History	None. Current grazing land
Previous SHELAA Ref (2018)	HO2
Site Description	The site comprises a parcel of land to the east of the settlement boundary of New Ash Green, containing an outbuilding and currently used as grazing land. Bounded by Church Road to the south, woodland to the north, and residential development to the east west and south (Grosvenor). A row of mature trees lines the western boundary.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	20 residential units
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to New Ash Green settlement boundary
Conclusion	PROGRESS TO FULL ASSESSMENT

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent to New Ash Green	
Land Use (GF/PDL)	100% 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	
Footnote 7 Assessment	Presence of Footnote 7 constraints – limited impact	
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 1 listed buildings	
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 improvements	
Settlement Classification	Within 250m of New Ash Green	
Town and Local Centres	Within 800m of New Ash Green, Village Centre; Within 2km of Hartley, Cherry Trees	
Train Station	Over 2km from Train Station	

GREEN	AMBER	RED
19	6	2

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 Parish Council</u> A response from Ash-cum-Ridley Parish Council strongly supports the proposed allocation and considers this site to be a good location for a low rise care home. The response also sets out additional comment in relation to footways, highways and design.
General Response	Highway access to Site NAG5 is constrained by poor visibility on narrow Church Road, inadequate sightlines at passing places and no safe cycle route, while remaining lanes lack footpaths and suffer from heavy LGV traffic and damage. Transport links to Longfield station rely on reduced bus schedules with no shelters or cycle connections. The local surgery/GP practice and primary school are operating beyond capacity and public transport to facilities is limited. Integration into the New Ash Green Village Association is seen as necessary to secure service charge contributions and safeguard community facilities. Proposed housing should mirror the settlement's character through yellow brick, suitable density and high-quality communal green spaces. Ecological impacts on protected species and soil structure are highlighted alongside concerns about loss of greenfield land. The absence of local employment, leisure and enforceable infrastructure commitments underlines the need for a funded delivery plan.
Key issues raised	Highway access and safety Character, settlement boundary and community identity Public transport and active travel connectivity Local infrastructure capacity (health, education, utilities) Community contributions and governance arrangements Ecology, greenfield impacts and green infrastructure Housing mix, design quality and density

SITE PROMOTER RESPONSE

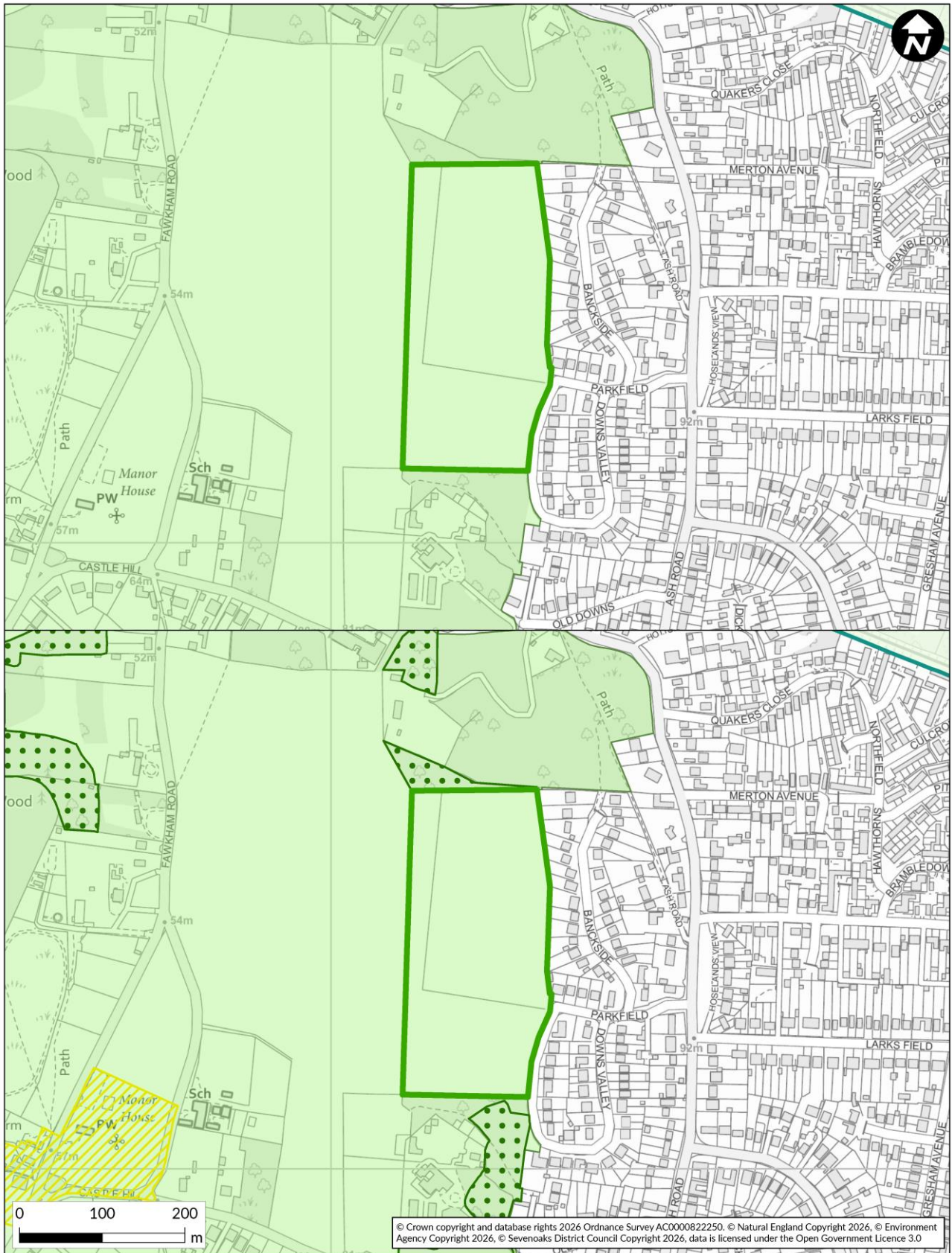
A response from the site promoter confirms that the site is available for allocation in the Local Plan and that all landowners are supportive of this. The response also confirms that the details included in the 2025 SHELAA are correct.

SHELAA 2026 CONCLUSIONS

Suitable?	The site is located adjacent to the settlement boundary of New Ash Green, which is a Primary Service Centre 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 existing access onto Church Road could be utilised, however a new/additional access may be required. Church Road is a narrow rural lane and is considered to have limited capacity, which would need further consideration. The site is greenfield Green Belt land but is considered to constitute Grey Belt land under national policy, due to its performance against Green Belt purposes A, B and D. It is noted that there are Footnote 7 constraints present on the site in the form of Designated Heritage Asset, however this is considered to have a limited impact. There are no other constraints which would make the site unsuitable. Due to the unconstrained nature of this site and its location adjacent to the settlement boundary of New Ash Green, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a grey belt site situated adjacent to New Ash Green and is considered to be suitable for allocation. The Development Brief work has tested capacity and considers the site capable of accommodating 20 residential units.
Allocated for	20 residential units
Regulation 19 (2026) Ref	ST4-22

HO/21/00062
Land adjacent to Banckside and Downs Valley, Hartley



SITE DETAILS	
SHELAA Reference	HO/21/00062
Regulation 19 Reference	ST4-23
Regulation 18 2025 Reference	HART6
Site Area (Ha)	6.08
Developable Area (Ha)	6.08
Brownfield / Greenfield	Greenfield
Planning History	No planning history – agricultural use
Previous SHELAA Ref (2018)	HO163
Site Description	The site forms a rectangular parcel of agricultural land adjacent to the western urban confines of Hartley. It is surrounded by residential development to the east, woodland to the north (some of which is ancient woodland), and a wider area of agricultural land to the south and west. The Open Spaces Study 2018 identifies the land as part of an area of natural and semi-natural open space. The site is elevated above road level.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	190 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes - Adjacent to Hartley urban confines
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	Yes – Open Spaces 2018	
Green Belt	Within the Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
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 near a SSSI	
SSSI Impact Zone	No risk	
Local Wildlife Site	Not within a LWS	
Local Nature Reserve	Adjacent to Rectory Meadow (LNR)	
Ancient Woodland	Adjacent to 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	None	
Site Access	New/additional access required	
Network Capacity	Limited capacity on transport network and requires improvements	
Settlement Classification	Within 250m of Hartley	
Town and Local Centres	Within 2km of Hartley, Cherry Trees and Longfield	
Train Station	Within 2km of Longfield	

GREEN	AMBER	RED
15	9	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 abuts Priority Habitats Inventory – Deciduous Woodland including Ancient and Semi-Natural Woodland to the north and south of the site.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Fawkham Parish Council</u> A response from Fawkham Parish Council objects to the inclusion of this site for allocation, citing concerns regarding the Green Belt boundary, landscape impact, impact on important local views, heritage assets, transport, groundwater source protection zone, best and most versatile land and community facilities <u>Hartley Parish Council</u> A response from Hartley Parish Council strongly objects to the proposed allocation, citing concerns regarding the Green Belt boundary, Landscape impact, impact on important local views, heritage assets, transport impact, groundwater source protection zone, best and most versatile land and community facilities.
Other Consultation Bodies	<u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP highlights the rich landscape around Hartley and raises concerns for the ecological considerations for this site. <u>The Woodland Trust</u> A response from The Woodand Trust highlights an area of Ancient and Semi-natural Woodland adjacent to the northern boundary of the site and recommends redrawing the boundary of the site.
General Response	Respondents highlight that Ash Road and surrounding lanes already operate near capacity with no suitable pedestrian or cycling routes and no proposed highway improvements. They note water supply, sewerage, GP, hospital and school services are at or beyond capacity and lack mitigation plans. The site lies

	outside the settlement boundary and within the Green Belt, conflicting with local and national policies and risking urban sprawl and loss of rural character. Concerns include the permanent loss of high-quality farmland, damage to ancient woodland and biodiversity without adequate buffers, and increased flood and groundwater risks due to missing SuDS or protection measures. Procedural issues include unclear consultation, undefined infrastructure delivery and calls for formal hearings to ensure proper review of ecological and design evidence.
Key issues raised	Highways and access capacity (Ash Road/local roads) Utilities and community infrastructure capacity Settlement status and planning classification (grey belt/settlement boundary/hierarchy) Landscape, visual and heritage setting Green Belt boundary integrity Biodiversity and ancient woodland protection Loss of agricultural land and food production Groundwater protection and flood risk management

SITE PROMOTER RESPONSE

DHA Planning on behalf of The Billings Group

A response from DHA Planning on behalf of The Billings Group highlights ongoing support for the allocation and confirms that the site remains available for inclusion in the Local Plan. The response provides further detail on the proposals for the site including a proposed masterplan.

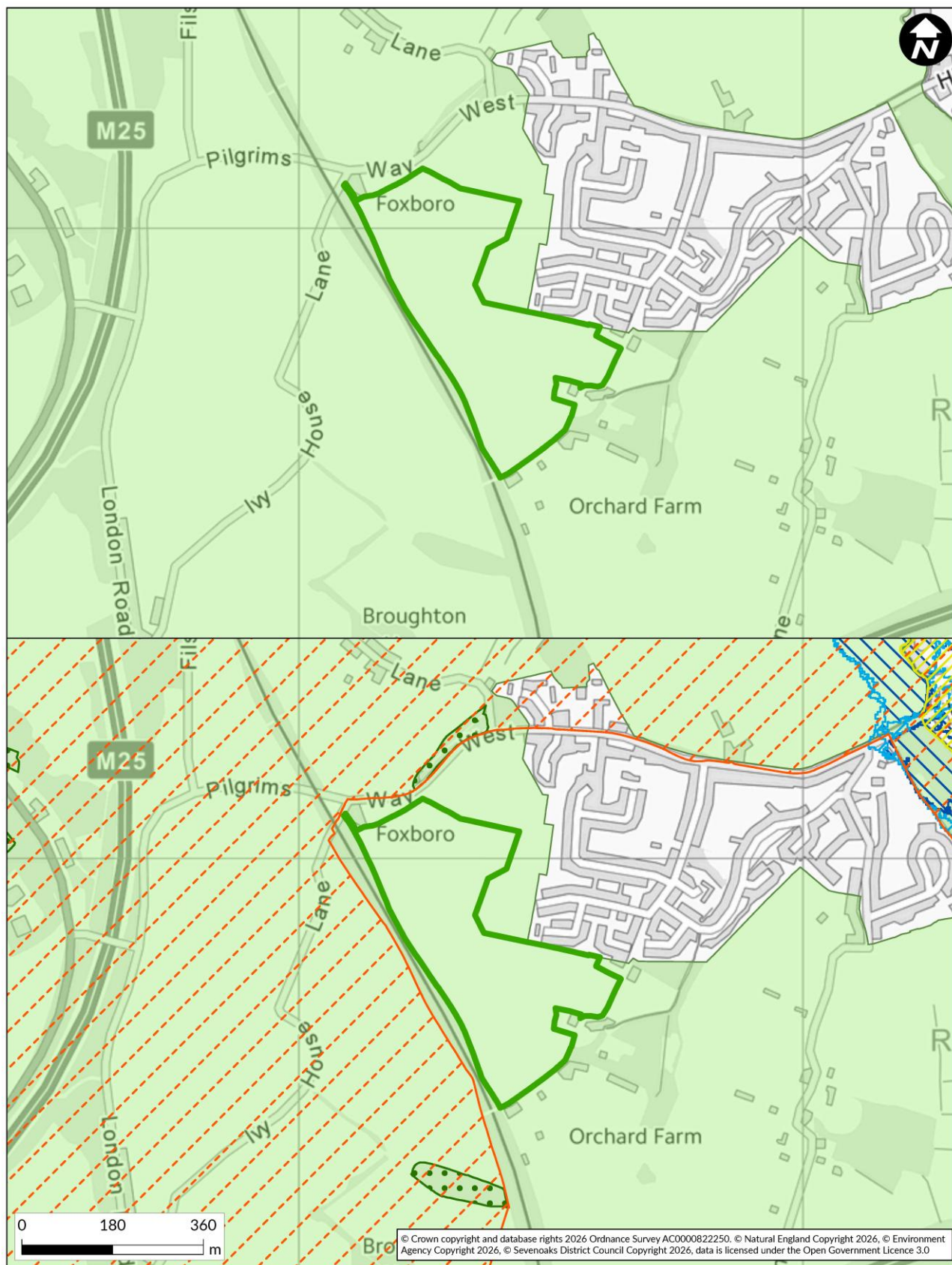
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield Green Belt site adjacent to the urban confines of Hartley, which is identified as a Primary Service Centre in the Settlement Hierarchy 2025. The site is therefore considered to be in a sustainable location, close to existing key services and facilities, including being within walking distance of Longfield Train Station. The site lies entirely within the Green Belt, although it is considered that the site constitutes grey belt land under national policy due to its performance against Green Belt purposes A, B and D. A Footnote 7 assessment has been undertaken and it is noted that the site is near to a Designated Heritage Asset, although it is considered that there is a limited impact and therefore the site is considered to constitute grey
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	belt. It is noted that the site lies within the wider parcel of emerging (not yet adopted) Natural & Semi-Natural open space 1036, although it is considered that the sites status as grey belt, its sustainable location and the demonstrable housing need outweighs this constraint. The site would require a new access, and it is currently considered that there is limited capacity on the transport network, which would require further consideration should this site move forward in the Local Plan process. Due to the sustainable location of this site and its status as grey belt land, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Hartley and is considered to be suitable for allocation. The Development Brief work has considered the capacity for the site and considers the site capable of accommodating 190 residential units.
Allocated for	190 residential units
Regulation 19 (2026) Ref	ST4-23

HO/21/00271
Land west of Hale Lane, Otford



SITE DETAILS	
SHELAA Reference	HO/21/00271
Regulation 19 Reference	ST4-24
Regulation 18 2025 Reference	OT2
Site Area (Ha)	13.34
Developable Area (Ha)	13.34
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	This is a greenfield site adjacent to the urban confines of Otford. The site comprises a parcel of land to the west of Otford, containing two large agricultural fields, separated by a hedgerow. The site is bound by residential development and a recreation ground to the east, Telston Lane and open countryside to the south, kennels and agricultural land to the north and the railway line to the west.
Site Description	HO313
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	203 residential units
SHELAA Conclusion	Suitable and Developable

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	Within Green Belt (but adjacent to Urban Confines of Otford)	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
National Landscapes	38.08% within 100m buffer of Kent Downs National Landscapes	
Landscape Sensitivity	29.71% Medium; 70.29% Low - Medium	
Agricultural Land Quality	Urban - 3.43%; Grade 3 - 16.18%; Grade 2 - 80.39%	
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	Potential impact to farmstead and Non Designated Heritage Asset	
Contamination Issues	Contaminated Land Assessment (former use)	
Noise Pollution	Noise Assessment (railway)	
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 Otford	
Town and Local Centres	Within 2km of Dunton Green, Otford High Street and Otford, Sevenoaks Road	
Train Station	Within 2km of Dunton Green and Otford	

GREEN	AMBER	RED
14	11.5	1.5

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 within the setting of the Kent Downs National Landscape, directly adjacent to its boundary. The response also highlights that the site lies near to the Sevenoaks Gravel Pits SSSI. Further advice on the above matters is signposted in the response.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Otford Parish Council</u> A response from Otford Parish Council strongly objects to the proposed site allocation, citing concerns including the cumulative impact of surrounding developments, infrastructure and service capacity, coalescence and settlement identity, social and community implications, the settlement hierarchy, affordable housing and local needs, as well as site specific objections including transport and access, density and character and landscape and design concerns.
Other Consultation Bodies	<u>Kent Downs National Landscape</u> A response from the Kent Downs National Landscape unit highlights the sites location immediately adjacent to the Kent Downs National Landscape and that it is therefore considered to lie within the setting. The response makes reference to the Landscape Sensitivity Assessment and also notes the North Downs Way National Trail along the southern boundary of the site. <u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns regarding site access and road safety on Telston Lane and Pilgrims Way West, as well as concerns regarding Green Belt and the Otford urban confines boundary, agricultural land quality and the

	cumulative impact of this and other proposed developments in the locality.
General Response	Respondents highlight that residential development to the west of Hale Lane would overload surrounding narrow rural lanes, Telston Lane, Pilgrims Way West, Rye Lane and Willow Park, causing congestion, safety risks and environmental harm, which would be unsuitable without road widening and costly junction works. Responses note that construction traffic would damage verges, generate noise, dust and vibration, and that operational traffic would exacerbate congestion at peak times and restrict emergency access. Local schools, medical practices and utilities are currently at capacity, public transport is infrequent, train station car parks reach capacity quickly and walking or cycling routes lack footways and lighting, making car dependency inevitable. The site lies within the Green Belt and grade 2 agricultural land, restricting urban sprawl and protecting landscape character and biodiversity, including wildlife corridors and chalk stream integrity, all of which would be compromised. Flood risk management and drainage proposals are absent, and no funded plans exist for necessary infrastructure upgrades.
Key issues raised	Highways and Local Road Capacity Construction, Operational Amenity and Safety Impacts Community Infrastructure and Services Capacity Green Belt / Agricultural Land and Land-designation Public Transport and Active Travel Connectivity Landscape, Heritage and National Landscape (AONB) Setting Biodiversity, Ecology and Habitat Connectivity Flood Risk, Drainage and Water Resources (including Chalk Stream)

SITE PROMOTER RESPONSE

Iceni Projects on behalf of Bellway Strategic Land

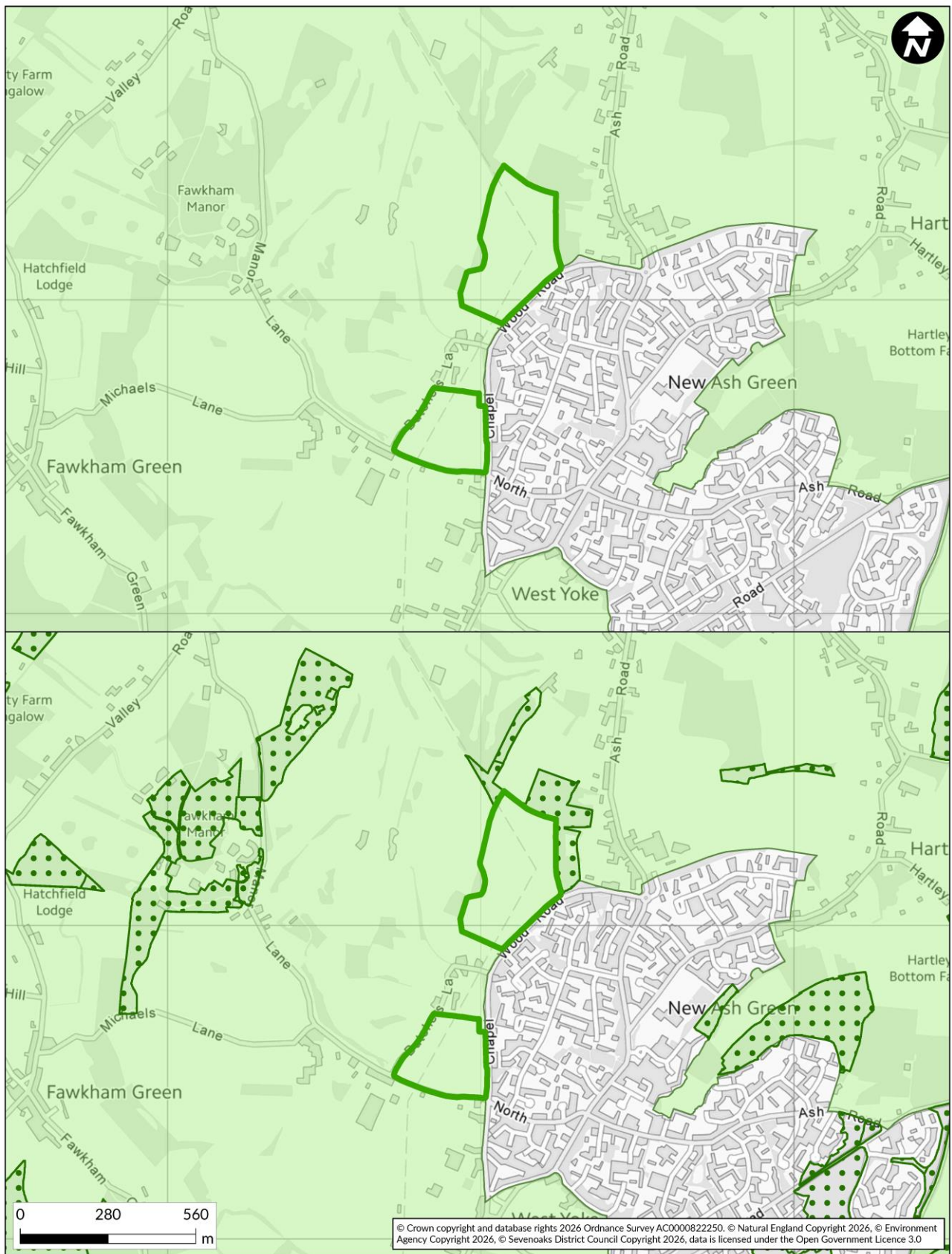
A response from Iceni Projects on behalf of Bellway Strategic Land, as the site promoter, supports the proposed allocation of this site in the Regulation 18 consultation and reaffirms availability of the site within the Plan period. The response provides further detail on the site proposals as well as wider comment on the emerging Local Plan policies and Development Strategy.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Otford, which is identified as a Primary Service Centre 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 2km of both Otford and Dunton Green stations. The site lies fully 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. A Footnote 7 Assessment has been undertaken and it is noted that this site lies adjacent to a SSSI and the Kent Downs National Landscape. However, it is not considered that these provide a strong reason for refusing or restricting development of this site and therefore the site constitutes grey belt. The majority of the site is Grade 2 Agricultural Land Quality, which would need further consideration. The Kent Downs National Landscapes buffer (100m) intersects 38% of the site, which also needs to be considered. Due to the sites highly sustainable location and classification as grey belt, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Otford and is considered to be suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 203 residential units.
Allocated for	203 residential units
Regulation 19 (2026) Ref	ST4-24

HO/21/00164
Land west of New Ash Green



SITE DETAILS	
SHELAA Reference	HO/21/00164
Regulation 19 Reference	ST4-25
Regulation 18 2025 Reference	NAG6
Site Area (Ha)	15.54
Developable Area (Ha)	15.54
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO72, MX6
Site Description	This is a greenfield site, split into two parcels, adjacent to New Ash Green. These two parcels have also been submitted separately, under HO/21/00159 and HO/21/00160. The northern parcel comprises a parcel of land containing an agricultural field, used for grazing. The parcel is bound by Chapel Wood Road to the south, residential development to the east, and woodland to the north and west. The southern parcel comprises a parcel of land forming part of an open agricultural field, used for grazing. The site is bound by Chapel Wood Road to the east, Manor Lane to the south, Butchers Lane to the west and agricultural use to the north.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	280 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	
Footnote 7 Assessment	Presence of Footnote 7 constraints – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Low - Medium	
Agricultural Land Quality	Other 2.52%; Grade 3 - 97.48%	
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	4.18% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Within 200m of 3 listed buildings	
Contamination Issues	Contaminated Land Assessment (former farmland)	
Noise Pollution	No specific risk	
Air Quality	Air Quality Assessment - impact of development on nearby roads dependent on scale and density	
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	88.46% 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	
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GREEN	AMBER	RED
16	9	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 abuts Priority Habitats Inventory – Deciduous Woodland including Ancient and Semi-Natural Woodland which is an irreplaceable habitat. The response also highlights the adjacent 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 does not support the proposed allocation, citing Green Belt concerns, sustainability, transport options, employment opportunities, scale of allocation, access and pedestrian and other environmental constraints.
Other Consultation Bodies	<u>The Woodland Trust</u> A response from The Woodland Trust disagrees with the proposed allocation, highlighting concerns regarding Ancient Woodland and recommending redrawing site boundaries to account for this. <u>Tom Tugendhat MP</u> A response from Tom Tugendhat MP highlights a planning application coming forwards in advance of the Local Plan process as well as highlighting the surrounding highways network.
General Response	Respondents highlighted traffic bottlenecks on narrow country lanes around NAG6 and voiced doubts over the capacity of roads to absorb extra vehicles. Medical, educational and policing services were reported to be at or near capacity with no firm

	plans for expansion. Site-specific constraints such as flood-prone clay soil, limited drainage, poor utilities and heritage buffers were noted as risks to delivery. The loss of green belt farmland, ancient woodland and rural character was felt to conflict with national planning policies. Sustainable travel, biodiversity and drainage strategies were deemed essential yet unfunded. Overall, respondents called for detailed, funded proposals for highways, infrastructure, utilities and environmental safeguards before any development proceeds.
Key issues raised	Highways and local road capacity Community infrastructure and social services capacity Site-specific technical constraints and deliverability Heritage, landscape character and density/visual impact Green Belt/land designation and agricultural land quality Public transport and sustainable travel provision Ecology, ancient woodland and biodiversity Drainage, flooding and water/sewerage utilities

SITE PROMOTER RESPONSE

Turley on behalf of Hallam Land Management

A response from Turley on behalf of Hallam Land Management, as site promoters, confirms support for the emerging allocation and confirms continued availability of the site for inclusion in the Local Plan. The site provides further comment on the Local Plan, the emerging planning application and site specific details relating to the emerging proposals.

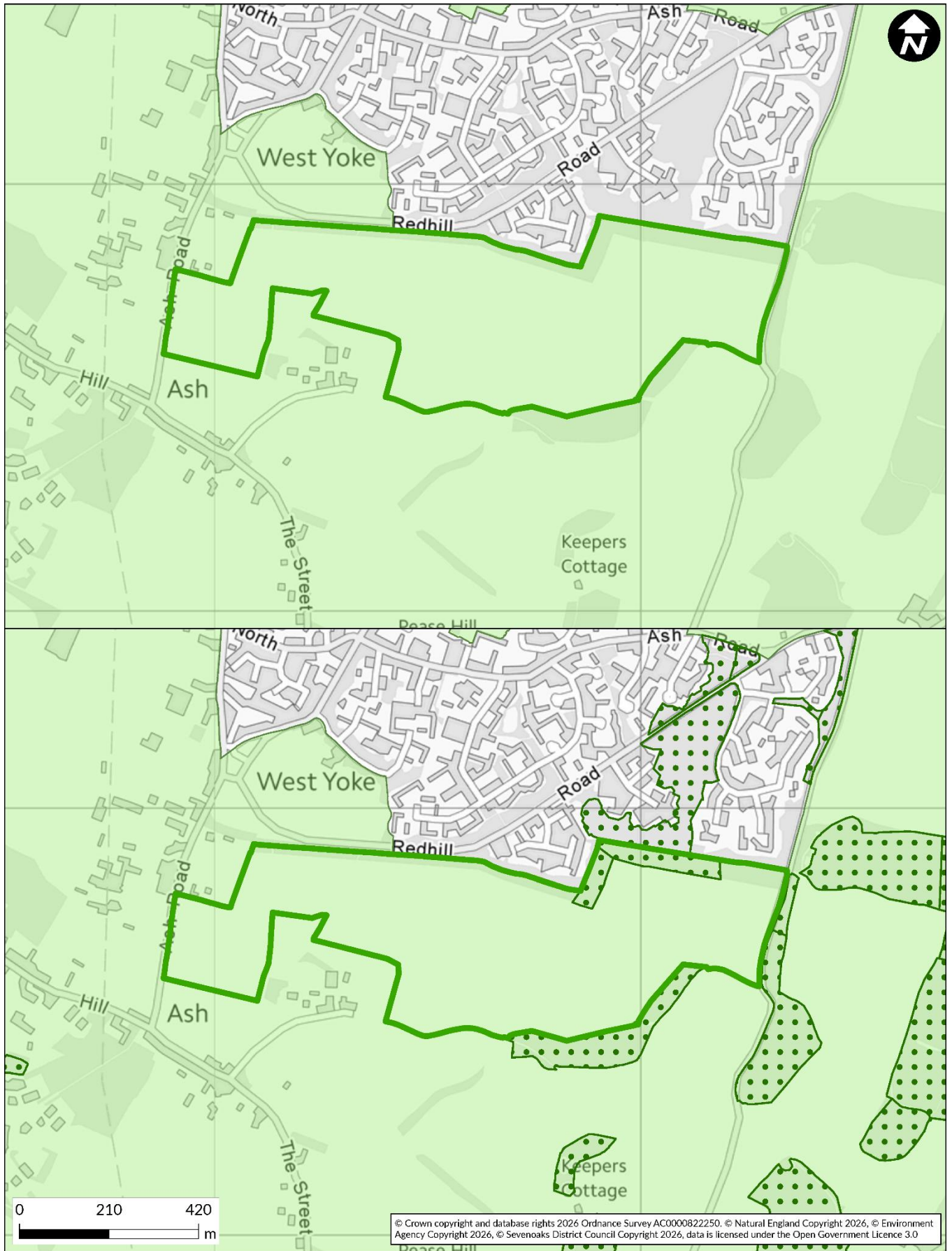
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site, split into two parcels, 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 the site does not benefit from access to a train station. The site lies fully within the Green Belt, but is considered to constitute grey belt due to its performance against Green Belt purposes A, B and D. The Footnote 7 assessment highlights that the site is adjacent to ancient woodland and a designated heritage asset and has high archaeological potential, however this is considered to have a limited impact and therefore does not alter the grey belt status of the site. The site does not lie within National Landscapes and
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	there are no other constraints which would make the site unsuitable. The site would require both contaminated land and air quality assessments should a scheme go forward on this site. A new access is required. Due to the unconstrained nature of the site, and the location adjacent to a top tier settlement, it is 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?	Developable

Overall Conclusion	Developable (Year 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to New Ash Green urban confines and is considered suitable for allocation. The Development Brief work has tested the capacity of the site and considers it capable of accommodating 280 residential units.
Allocated for	280 residential units
Regulation 19 (2026) Ref	ST4-25

MX/21/00041/B
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)	43.2
Developable Area (Ha)	43.2
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	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
National Landscape	Not within National Landscape	
Landscape Sensitivity	Medium, Commercial Sensitivity: Medium – High	
Agricultural Land Quality	Urban - 2.45%; Other - 32.16%; Grade 3 – 64.45%	
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	
Presence of Heritage Assets	Within 200m of 6 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	Within 250m of New Ash Green	
Town and Local Centres	Within 2km of New Ash Green, Village Centre	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
14	10	3

SHELAA 2026 ASSESSMENT

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 Footnote 7 Assessment confirms the presence of footnote 7 constraints, namely ancient woodland and potential heritage impacts, but given the size of the site is considered that these can be addressed through the boundary amendment and the Development Brief work and therefore do not alter the grey belt status of the site. 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. The site boundary has been amended to better maintain the separation between New Ash Green and Ash, as well as providing more protection to the listed church at

	St Peter and St Pauls. Therefore, due to its sustainable location, grey belt status and unconstrained nature, the site is considered 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of New Ash Green and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 530 residential units.
Allocated for	530 residential units
Regulation 19 (2026) Ref	ST4-26

HO/21/00170
Land east of Gorrige Avenue, Southdowns, South Darenth



SITE DETAILS	
SHELAA Reference	HO/21/00170
Regulation 19 Reference	ST4-27
Regulation 18 2025 Reference	SD3
Site Area (Ha)	0.17
Developable Area (Ha)	0.17
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO393
Site Description	This is a greenfield site within the buffer of South Darent urban confines. The site is currently unused land. The site is bound by Rabbits Road to the north, residential development to the east and west and open land to the south. The site does not currently benefit from an access.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	8 residential units (C2)
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of South Darent
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	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
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	Potential to impact setting of possible Non Designated 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/additional access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Not adjacent to settlement	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Within 2km of Farningham Road	

GREEN	AMBER	RED
17	5	5

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>Horton Kirby and South Darenth Parish Council</u> A response from Horton Kirby and South Darenth Parish Council notes the site is owned by Southdowns Retirement Village, which would restrict the availability of new housing to over 55's only. Additional vehicles would increase traffic in South Darenth, which already suffers with lack of parking and traffic congestion when the M25/Dartford Tunnel is gridlocked.
General Response	Respondents note that additional vehicles from Site SD3 would worsen South Darenth's existing parking shortages and traffic congestion, particularly during M25 or Dartford Tunnel gridlock, and indicate that ownership by Southdowns Retirement Village would restrict housing to over-55s, limiting availability for younger households and reducing housing diversity.
Key issues raised	Vehicular traffic impact Parking provision and on-street pressure Age-restricted occupancy and ownership

SITE PROMOTER RESPONSE

Nicholas Blythe Architects

A response from Nicholas Blythe Architects confirms ongoing support and availability of this site as a site allocation in the Local Plan. The response also makes specific comment regarding details included in the SHELAA assessment published alongside the Regulation 18 consultation in 2025, including the RAG rating outcomes and specific details relating to site proposals.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site near to South Darenth, which is identified as a Secondary Service Settlement in the Settlement Hierarchy
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	2025. It is therefore considered that this site is sustainably located for access to key services and facilities in South Darenth, although it is noted that the site is not directly adjacent to the settlement boundary. Of note for this site is that it does lie directly adjacent to the Southdowns Retirement Village and proposes C2 residential uses in keeping with this location. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against the Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that the site has high archaeological potential, which can be addressed through the Development Brief work and as such the grey belt status of the site remains unchanged. The site would require a new access and further consideration would need to be afforded to the Grade 2 agricultural land quality should a scheme come forwards on this site. There are no other constraints which would make the site unsuitable. Therefore, due to the site's status as grey belt land, its location adjacent to Southdowns retirement community and its relatively unconstrained nature, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site near to South Darenth, and within the existing retirement village of Southdowns, and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 8 residential units in C2 use (4 C3 units equivalent).
Allocated for	8 residential units in C2 use
Regulation 19 (2026) Ref	ST4-27

HO/21/00176
Land south of Victoria Drive, Southdowns



SITE DETAILS	
SHELAA Reference	HO/21/00176
Regulation 19 Reference	ST4-28
Regulation 18 2025 Reference	SD6
Site Area (Ha)	0.14
Developable Area (Ha)	0.14
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO390
Site Description	This is a greenfield site within the buffer of South Darent urban confines. The site is currently unused land. The site is bound by residential development on all sides, Prince Charles Avenue to the east and Victoria Drive to the north. The site does not currently benefit from an access.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	6 C2 units (equivalent 3 C3 units)
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of South Darent
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	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
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	Potential impact on setting of Non Designated Heritage Assets	
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	Not adjacent to settlement	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Within 2km of Farningham Road	

GREEN	AMBER	RED
18	5	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>Horton Kirby and South Darenth Parish Council</u> A response from Horton Kirby and South Darenth Parish Council disagrees with the proposed site allocation, citing infrastructure concerns, particularly around healthcare.
General Response	Age-restricted occupancy on Site SD6 could provide downsizing options for over-55 households within a managed care community and address both local and district needs of an ageing population. Respondents noted that six C2 units may offer on-site support and reduce demand on publicly funded social services, though impact may be limited by scale. The greenfield land south of Victoria Drive is seen as having little landscape value and no meaningful Green Belt function given its enclosure by development. Exclusion from the village envelope appears arbitrary. River Darent Medical Group's funding and staffing constraints may worsen appointment availability and waiting times if local GP registrations rise.
Key issues raised	Age-restricted occupancy Public social care demand C2 care accommodation Landscape and visual amenity Settlement boundary/infill Green Belt contribution Primary healthcare capacity

SITE PROMOTER RESPONSE

Nicholas Blythe Architects

A response from Nicholas Blythe Architects, as site promoter, confirms that the site remains available for allocation in the Local Plan and that the inclusion of the site in the Regulation 18 consultation is supported. The response also confirms details set out in the 2025 SHELAA.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site near to South Darenth, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. It is therefore considered that this site is sustainably located for access to key services and facilities in South Darenth, although it is noted that the site is not directly adjacent to the settlement boundary. The site lies within 2km of Farningham Road station. Of note for this site is that it does lie directly adjacent to the Southdowns Retirement Village and proposes C2 residential uses in keeping with this location. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against the Green Belt purposes A, B and D. The Footnote 7 assessment identifies that the site has high archaeological potential which can be addressed through the development brief work and as such the grey belt status of the site remains unchanged. The site would require a new access. There are no other constraints which would make the site unsuitable. Therefore, due to the sites status as grey belt land, its location adjacent to Southdowns retirement community and its relatively unconstrained nature, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site near to South Darenth and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and considers it capable of accommodating 6 C2 units (equivalent of 3 C3 units).
Allocated for	6 C2 units (equivalent 3 C3 units)
Regulation 19 (2026) Ref	ST4-28

HO/21/00175
Land south of garages, Prince Charles Avenue, Southdowns



SITE DETAILS	
SHELAA Reference	HO/21/00175
Regulation 19 Reference	ST4-29
Regulation 18 2025 Reference	SD7
Site Area (Ha)	0.29
Developable Area (Ha)	0.29
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO392
Site Description	This is a greenfield site within the buffer of South Darent urban confines. The site is currently unused land. The site is bound by residential garages to the north, open countryside to the east and south and residential development to the 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	13 residential units (C2)
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of South Darent
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	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Not within a Landscape Sensitivity Area	
Agricultural Land Quality	Urban (50%) Grade 2 (50%)	
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	Potential impact on setting of Non Designated Heritage Assets	
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	Not adjacent to settlement	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Within 2km of Farningham Road	

GREEN	AMBER	RED
17	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>Horton Kirby and South Darenth Parish Council</u> A response from Horton Kirby and South Darenth Parish Council strongly opposes the site and notes the development would lead to overdevelopment of Southdowns retirement village and would restrict under 55's from purchasing. South Darenth's narrow lanes and village streets are not designed for a significant increase in vehicle movements. The development would increase peak-time traffic, exacerbate congestion at local pinch points and create additional demand for on-street parking.
General Response	Respondents note that the proposed housing development on greenfield land south of the garages on Prince Charles Avenue could increase vehicle movements, worsen peak-time congestion at local pinch points, strain on-street parking capacity and overwhelm South Darenth's narrow lanes, and that concentrating C2 units for over-55s at the Southdowns care village site may lead to overdevelopment and restrict housing mix and local choice.
Key issues raised	Traffic generation and peak-time congestion Housing mix and age-restriction (C2 units / over-55s) On-street parking demand and capacity Local highway geometry and capacity

SITE PROMOTER RESPONSE

Nicholas Blythe Architects

A response from Nicholas Blythe Architects confirms ongoing support and availability of this site as a site allocation in the Local Plan. The response also makes specific comment regarding details included in the SHELAA assessment published alongside the Regulation 18 consultation in 2025, including the RAG rating outcomes and specific details relating to site proposals.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site near to South Darenth, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. It is therefore considered that this site is sustainably located for access to key services and facilities in South Darenth, although it is noted that the site is not directly adjacent to the settlement boundary. The site lies within 2km of Farningham Road station. Of note for this site is that it does lie directly adjacent to the Southdowns Retirement Village and proposes C2 residential uses in keeping with this location. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against the Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and these are not considered to apply to this site. The site would require a new access and further consideration would need to be afforded to the partial Grade 2 agricultural land quality should a scheme come forwards on this site. There are no other constraints which would make the site unsuitable. Therefore, due to the sites status as grey belt land, its location adjacent to Southdowns retirement community and its relatively unconstrained nature, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site near to South Darenth, and within the existing retirement village of Southdowns, and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 13 residential units in C2 use (7 C3 units equivalent).
Allocated for	13 residential units (C2)
Regulation 19 (2026) Ref	ST4-29

HO/21/00120
Land on the south side of West End, Kemsing



SITE DETAILS	
SHELAA Reference	HO/21/00120
Regulation 19 Reference	ST4-30
Regulation 18 2025 Reference	KEM2
Site Area (Ha)	0.38
Developable Area (Ha)	0.38
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 Kemsing. The site is currently an open field. The site is bound by West End to the north, open fields to the east and south, agricultural use to the south and residential use to the west. The site benefits from an existing access off West End.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	14 residential units
SHELAA Conclusion	Suitable and Deliverable

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	
Footnote 7 Assessment	No Footnote 7 Constraints	
National Landscapes	Not within National Landscapes	
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	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	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 Kemsing	
Town and Local Centres	Within 800m of Kemsing, The Parade	
Train Station	Within 2km of Otford	

GREEN	AMBER	RED
22	4	1

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 also raises concern regarding the cumulative impact of development in Kemsing.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Kemsing Parish Council</u> A response from Kemsing Parish Council strongly disagrees with the proposed site allocation, citing access concerns as well as concerns regarding infrastructure capacity. The response also highlights landscape sensitivity, the openness of the Green Belt and views.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns with site access as well as the cumulative impact of allocations in Kemsing on surrounding infrastructure.
General Response	Respondents note that Pilgrims Way East and Childsbridge Lane are narrow rural roads without footpaths, prone to flooding and closures. This contributes to congestion and increases the risk of collisions, especially as public transport is limited to a single hourly bus and station parking is scarce, leaving many residents reliant on cars. Construction traffic using the narrow lanes may also lead to noise, pollution and potential road damage. Pedestrian and cycle routes also lack safe separation, making active travel difficult. The existing infrastructure is reported to be under pressure too. Local primary-care services and schools are oversubscribed with no confirmed plans for expansion. Drainage, water supply and sewage networks already operate at capacity, raising concerns about future flooding or contamination without investment. Environmental implications are also highlighted. The loss of greenfield land and mature habitat is seen as a risk to landscape character, heritage settings and established wildlife corridors. Respondents note that no detailed mitigation, infrastructure funding or clear consultation

	information has been provided to address these issues before any potential first occupation.
Key issues raised	Highway access and vehicular capacity Education and primary-care capacity Landscape, heritage and visual amenity Biodiversity and ecological protection Pedestrian and cycle safety Public transport and station parking Drainage, water supply and wastewater capacity Construction traffic, phasing and mitigation

SITE PROMOTER RESPONSE

Progress Planning on behalf of Universal Land Limited

A response from Progress Planning, as the site promoter, confirms that the site remains available for allocation and supports the inclusion in the Regulation 18 consultation. The response also provides further detail on the site proposals including a proposed masterplan.

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 therefore considered to be in sustainable location, close to key services and facilities in Kemsing, including the allocated Local Centre at The Parade. The site also lies within 2km of Otford 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, which would need further consideration. There are no other constraints which would make this site unsuitable. Accordingly, due to the unconstrained nature of the site, its grey belt status and sustainable location adjacent to Kemsing, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Kemsing and is considered suitable for development. The Development Brief work has assessed the capacity of the site and considers it capable of accommodating 14 residential units.
Allocated for	14 residential units
Regulation 19 (2026) Ref	ST4-30

HO/25/00016
Land adjacent 72 Lower Road, Hextable



SITE DETAILS	
SHELAA Reference	HO/25/00016
Regulation 19 Reference	ST4-31
Regulation 18 2025 Reference	HEX6
Site Area (Ha)	0.56
Developable Area (Ha)	0.56
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. The site currently comprises an open field and an access road to a residential dwelling runs within the site boundary, to the west of the site. The site is bound by Lower Road to the north, open countryside to the east and west and residential development to the south. The site benefits from an existing access off Lower Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	18 residential units
SHELAA Conclusion	Suitable and Deliverable

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 use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Hextable	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Urban (51.4%), Grade 2 (48.6%)	
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	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not in 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 Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
21	4	2

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 agreed with the allocation, noting an existing planning application for 18 houses with no objections. However, they highlighted that Lower Road is in a high surface water flood risk zone and that any planning permission must ensure compliance with Policy W1.
General Response	Insufficient road capacity and safety risks arise from narrow lanes, congestion on key routes, and limited pavements and lighting; with school drop-offs and construction traffic adding hazards. Local schools, healthcare, and utility services are at capacity with no firm plans for expansion. Public transport offers irregular bus services and distant rail links, likely increasing car dependency. Development would consume high-quality farmland, erode the green buffer, and fragment wildlife habitats; reducing biodiversity and open space. Existing parking shortages at the station, schools and shops could worsen. Flood-risk reports for surrounding roads indicate high surface-water risk that requires site-specific assessment. Procedural and policy studies, such as contamination, landscape impact and infrastructure capacity assessments, are also necessary.
Key issues raised	Road network capacity and safety Local services and utilities capacity (schools, healthcare, utilities) Public transport accessibility and car dependency Loss of agricultural land and landscape/settlement separation Biodiversity and habitat retention Parking and rail-station capacity Construction impacts and phasing Flood risk and surface-water management Supplementary key points

SITE PROMOTER RESPONSE

Graham Simpkin Planning

A response from Graham Simpkin Planning confirms that the site remains available for inclusion as a site allocation in the Local Plan and that all landowners are supportive, as well as setting out further details in relation to deliverability and proposals for the site.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Hextable, which is classified as a Secondary 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. However, 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 constitute grey belt under national policy, due to its performance against Green Belt purpose A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and these are not considered to apply to this site. The site does not lie within the National Landscapes. The site lies partially within Grade 2 Agricultural Land Quality, which would require further consideration and a contaminated land assessment would be required due to former land use. There are no other constraints which would make this site unsuitable. Therefore, due to the sites status as grey belt land, unconstrained nature and sustainable location adjacent to a Secondary Service Settlement, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Hextable and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints

	and found the site to be capable of accommodating 9 residential units.
Allocated for	18 residential units
Regulation 19 (2026) Ref	ST4-31

HO/25/00025
Land at 70 Lower Road, Hextable



SITE DETAILS	
SHELAA Reference	HO/25/00025
Regulation 19 Reference	ST4-32
Regulation 18 2025 Reference	HEX7
Site Area (Ha)	0.41
Developable Area (Ha)	0.41
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. The site currently comprises an open field and an access road to a residential dwelling runs within the site boundary, to the east of the site. The site is bound by Lower Road to the north, open countryside to the east and west and residential development to the south. The site benefits from an existing access off Lower Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	14 residential units
SHELAA Conclusion	Suitable and Deliverable

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	No existing use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Hextable	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No Footnote 7 constraints	
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 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 Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
23	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>Hextable Parish Council</u> A response from Hextable Parish Council agreed with the allocation, noting an existing planning application for 18 houses with no objections. They highlighted that Lower Road is at high surface water flood risk and that any planning permission must ensure compliance with Policy W1.
General Response	Site HEX7's surrounding narrow lanes already become congested at peak times and lack pavements which raises safety, noise, and air quality concerns from extra car and construction traffic. Local schools, GP surgeries, utilities and broadband are reported at or near capacity with no funded expansion plans. Permanent loss of green belt and agricultural land threatens wildlife habitats, public footpaths, rural character, and views. Limited bus and rail services risk higher car dependency and further congestion. Historic flooding incidents and high surface water risk suggest new development could worsen local flooding and drainage issues.
Key issues raised	Highways capacity and road safety Local services and utilities capacity Green belt / agricultural land loss Landscape, heritage and village character Public transport accessibility and car-dependency Ecology and biodiversity impacts Construction logistics and access constraints Flood risk and surface water drainage

SITE PROMOTER RESPONSE

Graham Simpkin Planning

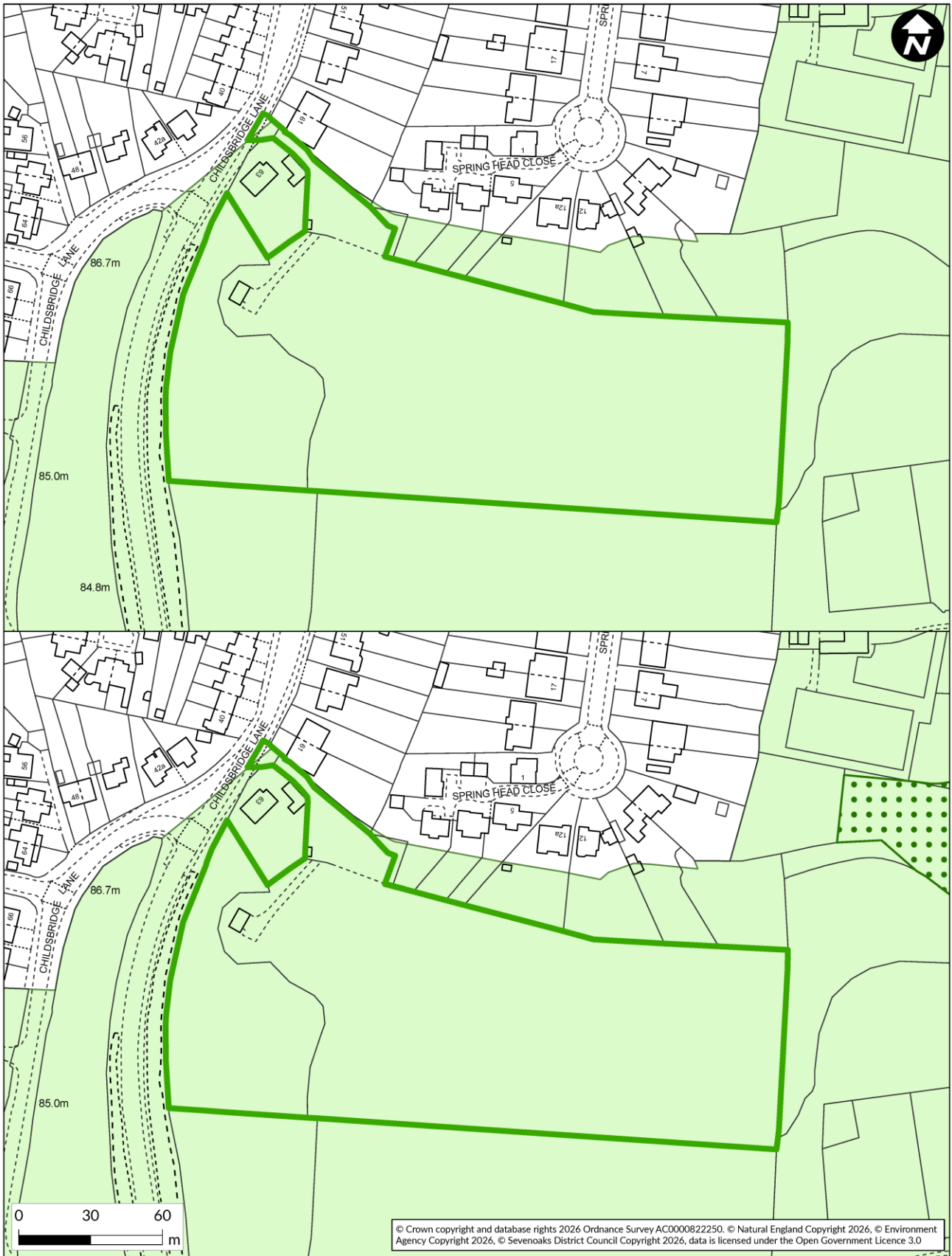
A response from Graham Simpkin Planning confirms that the site remains available for inclusion as a site allocation in the Local Plan and that all landowners are supportive, as well as setting out further details in relation to deliverability and proposals for the site.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Hextable, which is classified as a Secondary 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. However, 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 constitute grey belt under national policy, due to its performance against Green Belt purpose A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and these are not considered to apply to this site. The site does not lie within the National Landscapes. There are no other constraints which would make this site unsuitable. Therefore, due to the sites status as grey belt land, unconstrained nature and sustainable location adjacent to a Secondary Service Settlement, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Hextable and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 14 residential units.
Allocated for	14 residential units
Regulation 19 (2026) Ref	ST4-32

HO/25/00020
Land at Childsbridge Lane, Kemsing



SITE DETAILS	
SHELAA Reference	HO/25/00020
Regulation 19 Reference	ST4-33
Regulation 18 2025 Reference	KEM3
Site Area (Ha)	2.47
Developable Area (Ha)	2.47
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 Kemsing. The site comprises an area of land in agricultural use. The site is bound by residential development to the north, agricultural land to the east and south and Childsbridge Lane to the west. The site currently has one access off Childsbridge Lane.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	30 residential units
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – adjacent to 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	
Footnote 7 Assessment	No footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	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	Not in vicinity of heritage assets	
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 Kemsing	
Town and Local Centres	Within 800m of Kemsing, The Parade Within 2km of Seal, High Street	
Train Station	Within 2km of Otford	

GREEN	AMBER	RED
21	5	1

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 highlighting the cumulative impact of development in Kemsing.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Kemsing Parish Council</u> A response from Kemsing Parish Council strongly objects to the proposed allocation, citing concerns with access, highways traffic and safety, the Green Belt / grey belt assessment and infrastructure capacity with regard to education and healthcare in particular as well as drainage and sewerage infrastructure.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns regarding landscape sensitivity, highway safety and congestion, and the cumulative impact on infrastructure capacity. <u>Kent Downs National Landscape</u> A response from Kent Downs National Landscape unit highlights that the site lies within the setting of the Kent Downs National Landscape and cites the Landscape Sensitivity Assessment in relation to the North Downs. The response provides further detailed comment regarding views into and out of the National Landscapes.
General Response	Responses suggest that ecological networks would be fragmented, chalk streams damaged and protected species disturbed, additional concerns include potential soil contamination from past spoil disposal and limited consultation transparency. Respondents highlight that Pilgrims Way East and Childsbridge Lane already struggle with heavy traffic, recurring flooding, narrow bridges and a lack of footways, all of which create risks for pedestrians and cyclists and make access difficult for emergency services and HGVs. They also note that local infrastructure is under considerable pressure. Schools, GP surgeries and dental services in both Kemsing and Otford are

	reported to be at or near capacity with no funded expansion plans. Water supply, foul drainage and surface-water systems are also lack capacity. Environmental and landscape impacts are also highlighted. Development on Green Belt land is seen as threatening National Landscape functions, heritage assets, archaeological remains and the overall character of the village. Respondents add that ecological networks could be fragmented, chalk streams may be vulnerable to pollution or disturbance, and protected species could be affected. Further concerns include the potential for soil contamination linked to historic spoil disposal. Transport and movement constraints are another major theme. Bus services are infrequent, rail stations are oversubscribed and many pedestrian routes are considered unsafe, all of which increase car dependency. Construction traffic on the narrow lanes is also expected to worsen noise, congestion and road wear. Separately, respondents highlight concerns about a lack of transparency in the consultation process.
Key issues raised	Highways, access, congestion and road safety Education and health infrastructure capacity Landscape, heritage, AONB and Green Belt function Public transport, station access and parking Biodiversity, protected species and habitat networks Water supply, foul water capacity and chalk-stream protection Construction phase impacts, HGV movements and long-term road damage Flood risk and surface water drainage

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 the site promoter, confirms the continued availability of the site for allocation and supports the inclusion of the site at Regulation 18. The response provides further detail with respect of the site as well as providing wider commentary on the Local Plan and emerging Development Strategy.

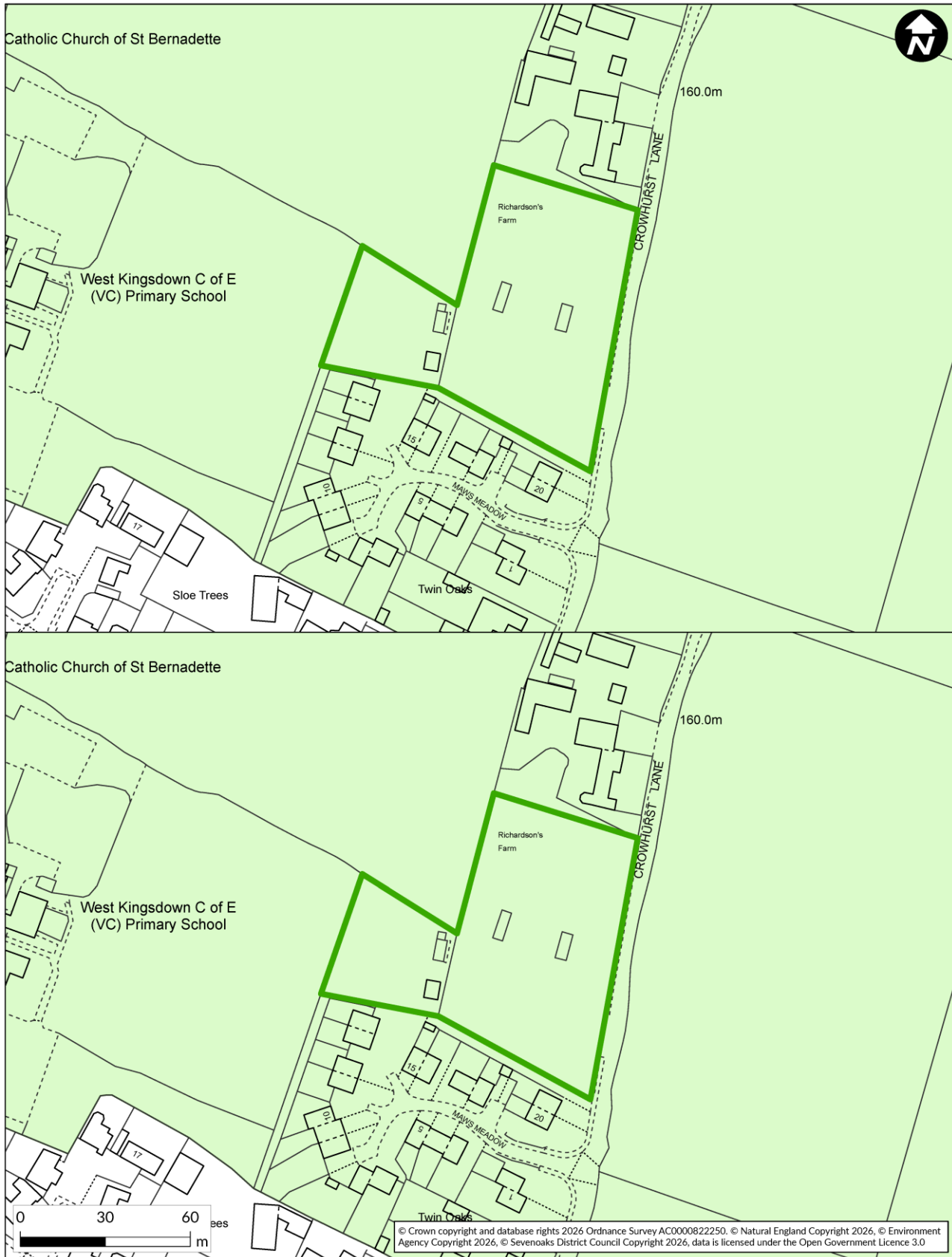
SHELAA 2026 CONCLUSIONS

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 therefore considered
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	to be in sustainable location, close to key services and facilities in Kemsing, including the allocated Local Centre at The Parade and in Seal, High Street. The site also lies within 2km of Otford 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 Grade 3 agricultural land quality, both of which would need further consideration. There are no other constraints which would make this site unsuitable. Accordingly, due to the unconstrained nature of the site, its grey belt status and sustainable location adjacent to Kemsing, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield grey belt site adjacent to the urban confines of Kemsing and is considered to be suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 30 residential units.
Allocated for	30 residential units
Regulation 19 (2026) Ref	ST4-33

HO/21/00047
Richardson's Farm, West Kingsdown



SITE DETAILS	
SHELAA Reference	HO/21/00047
Regulation 19 Reference	ST4-34
Regulation 18 2025 Reference	WK4
Site Area (Ha)	0.64
Developable Area (Ha)	0.64
Brownfield / Greenfield	Greenfield
Planning History	No planning history
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site at the southeastern corner of West Kingsdown. It comprises overgrown scrubland/woodland and is bounded by Crowhurst Lane to the east, residential development to the north and south and a primary school and open field to the west.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	20 residential units
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of 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	Within Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No Footnote 7 Constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Medium (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 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	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 2km of West Kingsdown, Hever Road	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
17	7	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 Kent Downs National Landscape.
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 objects to this proposed site due to access concerns, as well as citing pedestrian provision and sewage concerns.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent highlights that the site is in the Green Belt and raises concerns regarding the surrounding highways and pedestrian provision as well as sewage discharge from the site.
General Response	Respondents identify capacity for 21 homes on a single-ownership site that could meet 50 percent affordable housing requirement, whilst others identify considerations which indicate otherwise. Crowhurst Lane’s single-track alignment, narrow pinch points and lack of pavements challenge vehicular and pedestrian safety. The lane’s use by industrial vehicles and a gypsy/traveller site intensifies congestion and manoeuvring difficulties. Limited public transport, a two-kilometre distance to the nearest station and poor bus punctuality risk isolation for non-drivers. Foul drainage via the Southfields Road sewer may worsen flooding. Ecology surveys indicate biodiversity net gain will require off-site measures. The site’s green belt status, woodland sensitivity and inconsistent appraisal further question its suitability.
Key issues raised	Technical constraints and site capacity Highway access and capacity Accessibility and public transport Green Belt and landscape setting Local services and community impact Ecology and biodiversity mitigation Foul drainage and sewer capacity

	Housing delivery and affordable provision
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SITE PROMOTER RESPONSE

DHA Planning

A response from DHA Planning as site promoters confirms that the site remains available for allocation in the Local Plan and supports the proposals in the Regulation 18 consultation. The response provides further detail on the proposal for the site including an illustrative proposed site layout plan.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site located in the Green Belt near to West Kingsdown, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. Therefore, 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. Although the site itself does not lie directly adjacent to the urban confines boundary, it is adjacent to site WK3 (HO/21/00219), which is adjacent to the urban confines and considered suitable through this SHELAA. The site does lie fully within the Green Belt but is considered to constitute grey belt under national policy, due to its performance against Green Belt purposes A, B and D. There are no Footnote 7 constraints on the site and therefore the site is considered to be grey belt land. The site does not lie within national landscapes. There is considered to be limited capacity on the surrounding transport network and a contaminated land assessment would also be required for this site. A new access is also required. There are no other constraints which would make this site unsuitable, and therefore due its grey belt status and sustainable location adjacent to West Kingsdown, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
	This is a grey belt site adjacent to West Kingsdown and is considered to be suitable for allocation. The Development Brief

SDC Comments	work has assessed the capacity of the site and considers the site capable of accommodating 20 residential units.
Allocated for	20 residential units
Regulation 19 (2026) Ref	ST4-34

HO/21/00135
Land west of College Cottages, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00135
Regulation 19 Reference	ST4-35
Regulation 18 2025 Reference	HEX3
Site Area (Ha)	0.65
Developable Area (Ha)	0.65
Brownfield / Greenfield	Greenfield
Planning History	Consultation for outline application to replace existing nurseries with a residential development (18/00966/OBB)
Previous SHELAA Ref (2018)	HO58 / HO20 / HO123
Site Description	This is a brownfield site adjacent to the urban confines of Hextable. The site currently comprises former horticultural nursery/college and two residential dwellings and associated land. The site is bound by residential to the east, community complex and Hextable Gardens to the south and undeveloped land to the north and west. The site current has existing access from Crawfords.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	27 residential units
SHELAA Conclusion	Suitable and Deliverable

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 Hextable	
Land Use (GF/PDL)	Greenfield	
Existing use	Yes, but not allocated	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within the Green Belt	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – limited impact	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium: SW1 Swanley North including Hextable	
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 2 listed buildings 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	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 Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road Within 2km of Swanley – Town Centre	
Train Station	Over 2km from a railway station	

GREEN	AMBER	RED
20	4	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>Hextable Parish Council</u> A response from Hextable Parish Council agrees with the inclusion of this site as a Local Plan allocation, considering that some of the site is appropriate for development. The response provides specific comment on local character and amenity, heritage assets and access.
General Response	Respondents warned that narrow single-lane roads and limited parking around Site HEX3 would be unable to absorb additional vehicle movements, heightening congestion, safety risks, and on-street parking issues and that infrequent public transport would intensify car dependency. Construction access along unmade tracks and country lanes was described as unsuitable. Infrastructure, education, healthcare, and community services were deemed at capacity with no clear delivery or funding plans. The site's green belt agricultural land and wildlife habitats were noted as requiring protection to preserve landscape character, biodiversity and heritage settings, while surface water flood risk and limited SuDS evidence raised drainage concerns. Consultation options were viewed as too high level.
Key issues raised	Highway capacity, traffic and parking Construction logistics and site access Infrastructure delivery, viability and evidence base Education, healthcare and community services capacity Green Belt and agricultural land Biodiversity, habitats and ecological mitigation Heritage, landscape character and settlement separation Surface water flood risk and drainage (SuDS)

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 situated adjacent to the urban confines of Hextable, which is classified as a Secondary Service Centre in the Settlement Hierarchy 2025, and therefore is considered to be a sustainable location, close 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, however is considered to constitute grey belt under national policy due being previously developed land and its performance against Green Belt purposes A, B and D. The Footnote 7 assessment highlights that the site is adjacent to Designated Heritage Asset and has high archaeological potential, however this is considered to have a limited impact and accordingly the site is considered to constitute grey belt land. The site does not lie within the National Landscapes and it does not have any other constraints which would make it unsuitable. There is considered to be existing capacity on the transport network and there is an existing access, off Crawford, which could be utilised, although contributions towards improvements may still be sought. Due to the sites location, adjacent to Hextable, unconstrained nature and its grey belt status, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to Hextable urban confines and is considered suitable for allocation. The Development Brief

	work has assessed the capacity of the site and it is considered capable of accommodating 27 residential units.
Allocated for	27 residential units
Regulation 19 (2026) Ref	ST4-35

HO/21/00173
Land south of Prince Charles Avenue, Southdowns



SITE DETAILS	
SHELAA Reference	HO/21/00173
Regulation 19 Reference	ST4-36
Regulation 18 2025 Reference	SD5
Site Area (Ha)	1.08
Developable Area (Ha)	1.08
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	N/A
Site Description	This is a greenfield site within the buffer of South Darent urban confines. The site is currently unused land. The site is bound by residential to the north, allotments to the west and open countryside to the east and south. The site benefits from an existing access from Skinney Lane.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	40 residential units (C2)
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of South Darent
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	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
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	Potential to impact of Non Designated Heritage Assets	
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	Not adjacent to settlement	
Town and Local Centres	Over 2km from town or local centre	
Train Station	Within 2km of Farningham Road	

GREEN	AMBER	RED
17	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>Horton Kirby and South Darenth Parish Council</u> A response from Horton Kirby and South Darenth Parish Council strongly opposes the site allocation and notes the site is within the boundary of Southdowns Retirement Village, restricting buyers to the over 55's only. The site consists of a strip of land leading from Skinney Lane (an unclassified single track road), opening out to an approximately 2.665 acre site. However, the strip of land and site are joined to HO/21/00174, which has been classified as unsuitable due to its greenfield land status. The council questions why the site has been classed as suitable.
General Response	Respondents note that the site lies outside the urban boundary on green belt land and its allocation seems inconsistent next to an adjacent greenfield site deemed unsuitable, despite existing development reducing its buffer role. They highlight limited capacity in local infrastructure and public services, with housing nearing the area's limit. Allocation consistency is questioned in relation to Site SD5 and HO/21/00174, as similar land receives different suitability classifications. The greenfield land south of Prince Charles Avenue is seen as having little landscape value. Its urban fringe location is said to risk coalescence, undermining the green belt's role in keeping settlements distinct. Exclusion from the settlement envelope beside Southdowns Retirement Village is described as arbitrary. Some respondents argue that the site brings no development benefit and the land is unsuitable for further housing. Others note that 30 C2 care units could meet ageing needs and ease pressure on public services by offering downsizing options within a supportive community.
Key issues raised	Green Belt / greenfield designation Local infrastructure and public services capacity Allocation consistency and comparative site suitability Landscape value and visual impact Care housing / C2 provision and demographic fit Settlement separation and coalescence

	Settlement boundary / envelope anomaly
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SITE PROMOTER RESPONSE

Nicholas Blythe Architects

A response from Nicholas Blythe Architects confirms ongoing support and availability of this site as a site allocation in the Local Plan. The response also makes specific comment regarding details included in the SHELAA assessment published alongside the Regulation 18 consultation in 2025, including the RAG rating outcomes and specific details relating to site proposals

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site near to South Darenth, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. It is therefore considered that this site is sustainably located for access to key services and facilities in South Darenth, although it is noted that the site is not directly adjacent to the settlement boundary. The site lies within 2km of Farningham Road station. Of note for this site is that it does lie directly adjacent to the Southdowns Retirement Village and proposes C2 residential uses in keeping with this location. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against the Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and it is identified that the site has high archaeological potential which can be addressed through the Development Brief work and as such the grey belt status of the site remains unchanged. The site would require a new access. There are no other constraints which would make the site unsuitable. Therefore, due to the sites status as grey belt land, its location adjacent to Southdowns retirement community and its relatively unconstrained nature, the site is 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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan

SDC Comments	This is a greenfield site near to South Darenth, and within the existing retirement village of Southdowns, and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 40 residential units in C2 use (21 C3 units equivalent).
Allocated for	40 residential units (C2)
Regulation 19 (2026) Ref	ST4-36

HO/21/00172
Land north of Rabbits Road, South Darent



SITE DETAILS	
SHELAA Reference	HO/21/00172
Regulation 19 Reference	ST4-37
Regulation 18 2025 Reference	SD4
Site Area (Ha)	3.08
Developable Area (Ha)	3.08
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO387
Site Description	This is a greenfield site within the buffer of South Darent urban confines. The site is currently unused land. The site is bound by the railway line to the north, open countryside to the east, Rabbits Road and Southdowns Retirement Village to the south and residential to the west. The site benefits from an existing access off Rabbits Road.
Site Type	New Build
When will this development be delivered?	Years 1-5
SHELAA Yield	58 residential units
SHELAA Conclusion	Suitable and Deliverable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Yes – within buffer of South Darent
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	
Green Belt Stage 3	Grey belt	
National Landscapes	Not within National Landscapes	
Footnote 7 Assessment	Presence of Footnote 7 constraints	
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	Potential to impact setting of Non Designated Heritage Assets	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment – adjacent 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	Not adjacent to settlement	
Town and Local Centres	Over 2km from Town or Local Centre	
Train Station	Within 2km of Farningham Road	

GREEN	AMBER	RED
17	5	5

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England notes that there are desire lines on the site visible aerially, suggesting the land may be used by the public for recreational purposes. Natural England advises reference to their guidance on 'Greenfield and Open Space'. <u>National Grid Electricity Transmission</u> A response from National Grid Electricity Transmission noted the presence of a decommissioned DC cable (Kingsnorth – Beddington) in the vicinity of the site.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Horton Kirby and South Darenth Parish Council</u> A response from Horton Kirby and South Darenth Parish Council states that the site is an undeveloped field within the Metropolitan Green Belt and is owned by Southdowns Retirement Village. Access would be via Rabbits Road, a single-vehicle-width country lane with no pedestrian footpath. The development would increase peak-time traffic, exacerbate congestion at local pinch points and create demand for on-street parking. The cumulative traffic from these developments would increase congestion on village roads and at strategic junctions.
General Response	Respondents note that Site SD4 lies between South Darenth village and Southdowns retirement village within the Green Belt, making its exclusion from the settlement envelope appear arbitrary. They highlight that the land could supply significant housing to meet local and district needs but raise doubts about its deliverability. Its location north of Rabbits Road, flanked by existing development, suggests infill potential and inconsistent boundary drawing. Respondents question its contribution to Green Belt function, argue it provides little separation value and should remain undeveloped, and consider it of little landscape value with minimal visual impact if developed. Concerns also include increased peak-time traffic on narrow village lanes, informal footpaths indicating recreational use, and the relevance of greenfield and open space guidance to the proposal.
Key issues raised	Ownership and adjacency to Southdowns retirement village

	Housing supply and allocation deliverability Settlement boundary and infill potential Green Belt function Landscape and visual impact Highway access and traffic capacity Public recreational use and open space value
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SITE PROMOTER RESPONSE

Nicholas Blythe Architects

A response from Nicholas Blythe Architects confirms ongoing support and availability of this site as a site allocation in the Local Plan. The response also makes specific comment regarding details included in the SHELAA assessment published alongside the Regulation 18 consultation in 2025, including the RAG rating outcomes and specific details relating to site proposals.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site near to South Darent, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. It is therefore considered that this site is sustainably located for access to key services and facilities in South Darent, although it is noted that the site is not directly adjacent to the settlement boundary. The site lies within 2km of Farningham Road station. Of note for this site is that it does lie directly adjacent to the Southdowns Retirement Village. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against the Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and identifies that the site has high archaeological potential which can be addressed through the Development Brief work and as such the grey belt status of the site remains unchanged. The site currently has an existing access off Rabbits Road, which could be utilised. Further consideration would need to be afforded to the Grade 2 agricultural land quality should a scheme come forwards on this site. A noise assessment would be required for this site due to the proximity to the railway line. There are no other constraints which would make the site unsuitable. Therefore, due to the site's status as grey belt land, its location adjacent to Southdowns retirement community and its relatively unconstrained nature, the site is considered to be suitable for development.
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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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a greenfield site near to South Darenth and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 58 residential units.
Allocated for	58 residential units
Regulation 19 (2026) Ref	ST4-37

HO/21/00217
Land adjacent Puddledock Lane, Top Dartford Road, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00217
Regulation 19 Reference	ST4-38
Regulation 18 2025 Reference	HEX9
Site Area (Ha)	2.65
Developable Area (Ha)	2.65
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO243
Site Description	Area of scrubland immediately adjacent to the settlement of Hextable. The site is relatively well contained by Top Dartford Road to the south, residential to the east and west and woodland (Wilmington Woods) to the north. 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	75 residential units
SHELAA Conclusion	Suitable and Developable

SHELAA STAGE 1	
Does this site meet the proposed Development Strategy?	Greenfield site adjacent to the settlement 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 Green Belt adjacent to urban confines	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No Footnote 7 constraints	
National Landscapes	Not within National Landscape	
Landscape Sensitivity	100% within SW1 Swanley north including Hextable Residential Sensitivity: Low - Medium	
Agricultural Land Quality	Urban 54% Grade 3 45%	
Flood Risk	Flood Zone 1	
Site of Special Scientific Interest (SSSI)	Not within a SSSI	
SSSI Impact Zone	No specific risk	
Local Wildlife Site	Adjacent to Wilmington Woods, a Local Wildlife Site (LWS) in Dartford	
Local Nature Reserve	Not within an LNR	
Ancient Woodland	Not within Ancient Woodland	
Presence of Heritage Assets	Potential impact on Non Designated Heritage Asset	
Contamination Issues	No specific risk	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	None	
Site Access	Off Top Dartford Road	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Hextable	
Town and Local Centres	All proposed access points are over 2km from a town or local centre	
Train Station	All proposed access points are over 2km from a railway station	

GREEN	AMBER	RED
18	6	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 abuts Priority Habitats Inventory – Deciduous Woodland to the north and advised the allocation should have regard for NPPF paragraph 192b and Policy BW2 to conserve, restore and enhance this priority habitat.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hextable Parish Council</u> A response from Hextable Parish Council raised concerns over irreversible ecological and biodiversity damage, including loss of hedgerows, slow worms, badgers and birds of prey. They noted the narrow lane adjoins schools and is already at capacity during school hours, and that the site adjoins a wildlife reserve and Rowhill Grange Hotel, requiring compliance with Policy HEN7.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP raised concerns about the site's proximity to Wilmington Woods wildlife area, warning that development risks irreversible damage to local biodiversity including slow worms, badgers and birds of prey. She also noted the location is already subject to flooding and highlighted its distance from Swanley station as a sustainability concern.
General Response	Respondents highlight that road access around Site HEX9 is constrained by congestion, narrow lanes, inadequate junctions and parking, raising highway and pedestrian safety concerns. They note potential traffic increases from construction and new dwellings could worsen bottlenecks and air quality. The site's development is seen as threatening local biodiversity, protected species and ancient woodland, while eroding high-quality agricultural land, green belt buffers, and landscape character. Limited public transport, oversubscribed healthcare, school and community services, flood risk from surface-water runoff, and

	inadequate off-street parking are identified as likely to strain infrastructure. Policy adjustment requests include revised density ranges, site capacity expressions and clearer delivery strategies.
Key issues raised	Road access and highway safety Biodiversity, protected species and ecological integrity Green belt, agricultural land and landscape character Healthcare and wider community services capacity Parking provision and on-street parking pressure Public transport and sustainable access School capacity and school-time safety/parking Flood risk and surface-water drainage

SITE PROMOTER RESPONSE

DMH Stallard LLP on behalf of B.Yond Homes

A response from DMH Stallard LLP on behalf of B.Yond Homes supports the allocation of this site within the Local Plan and recommends potential changes to both the site allocation and emerging Policies. The response also supports the findings of the Green Belt assessment of the site as grey belt and the sustainable location of the site adjacent to a secondary service settlement.

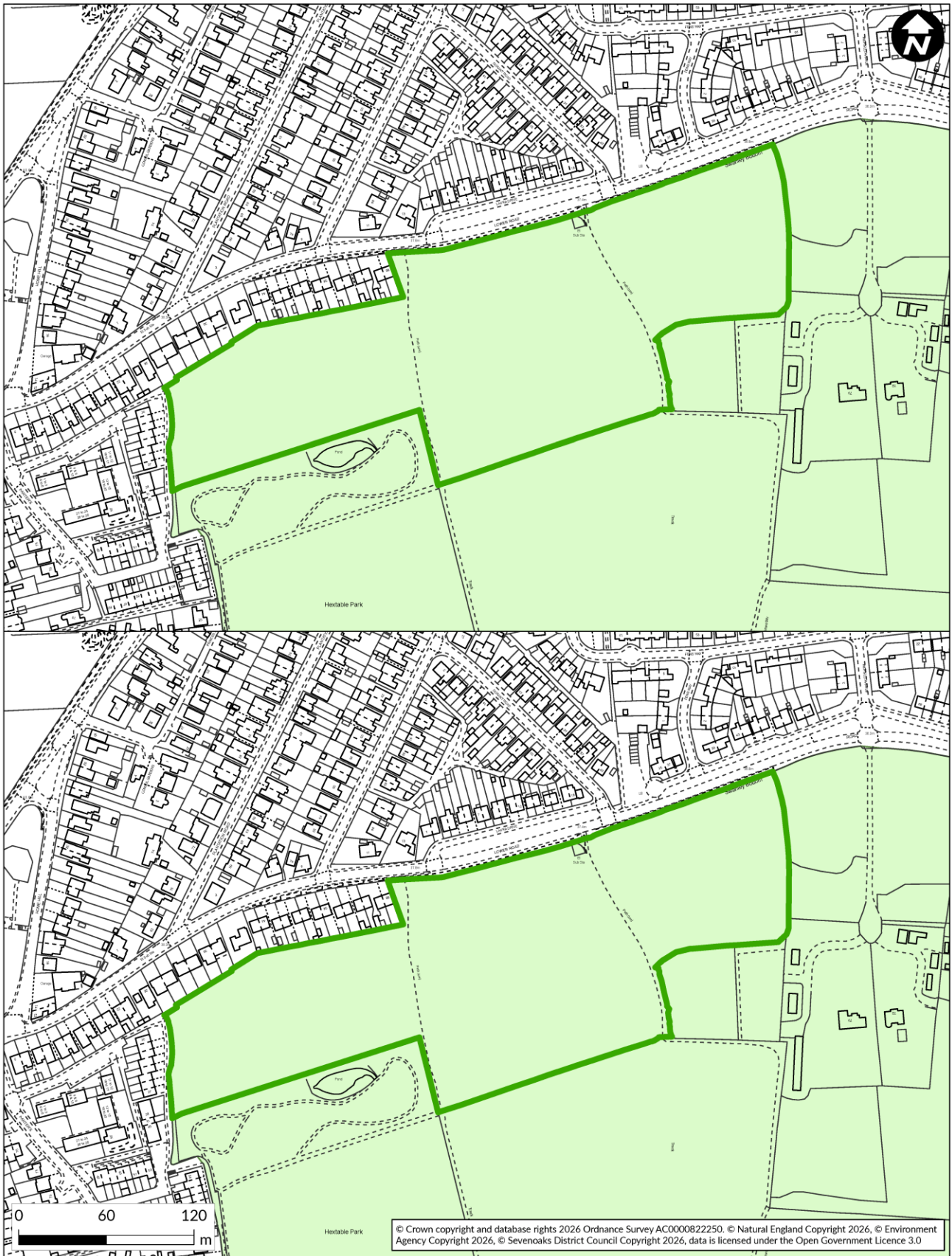
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site situated adjacent to 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, although it is noted that the site lies over 2km from a railway 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. An assessment of NPPF Footnote 7 constraints has been undertaken and these are not considered to apply to this site. The site does not lie within National Landscapes. The site is partially Grade 3 agricultural land quality which would require further consideration, as well as being adjacent to a Local Wildlife Site. There are no other constraints which would make this site unsuitable. Therefore, due to the sustainable location, unconstrained nature and grey belt status, this site is considered suitable for development.
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Availability	The site has been submitted to the call for sites 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Hextable and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 75 residential units.
Allocated for	75 residential units
Regulation 19 (2026) Ref	ST4-38

HO/21/00223
Land south of Lower Road, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00223
Regulation 19 Reference	ST4-39
Regulation 18 2025 Reference	HEX8
Site Area (Ha)	4.99
Developable Area (Ha)	4.99
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO55
Site Description	This is a large greenfield site adjacent to the urban confines. The site is currently in use as agricultural land. The site is bound by Lower Road and residential development to the north, agricultural use to the east and south, Hextable Park to the south and residential development to the north. The site does not currently benefit from an existing vehicular access.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	156 residential units
SHELAA Conclusion	Suitable and Developable

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 urban confines	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt adjacent to Hextable	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium	
Agricultural Land Quality	Grade 2 (62%), Grade 3 (25%), Urban (12%)	
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	22.95% within River Terrace Deposits	
Site Access	New access required	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Hextable	
Town and Local Centres	Within 800m of Hextable, Upper Main Road	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
20	5	2

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England highlights a Public Right of Way running through the site from north to south, as well as desire lines.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hextable Parish Council</u> A response from Hextable Parish Council strongly opposes the site allocation, citing concerns regarding the green buffer between Hextable and Swanley Village, loss of farmland, infrastructure capacity, overdevelopment, pathways and public rights of way, flood risk, heritage assets and Green Belt. <u>Sutton-at-Hone and Hawley Parish Council</u> A response from Sutton-at-Hone and Hawley Parish Council highlights concerns surrounding car dependency and highways impacts, sustainability, change to the rural character and landscape of the area and existing infrastructure capacity.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns around the loss of agricultural land, mineral safeguarding area, the sites location adjacent to Hextable Park, flooding and infrastructure capacity.
General Response	Respondents note that Hextable's limited public transport forces car use and that the proposed development's traffic increase would exacerbate congestion on narrow roads and at key junctions without off-site highway upgrades. Community services and utilities, including schools, healthcare, drainage, water supply, and broadband, are described as operating at capacity which risks oversubscription, flooding, and service interruptions. The housing allocation is said to threaten rural landscape character, settlement separation, open fields, hedgerows, biodiversity, and productive agricultural land that supports local food production. Recorded surface-water flooding and constrained drainage infrastructure raise concerns about increased runoff and flood risk. Potential loss of public rights of

	way and recreational open space is highlighted, alongside gaps in the transport assessment, mapping inconsistencies and the omission of brownfield and smaller-scale growth options.
Key issues raised	Highway capacity, access, congestion and parking Capacity of community services and utilities Landscape, village character, separation and privacy Green Belt, agricultural land and food security Flood risk and surface-water drainage Public transport provision and car-dependency Biodiversity, hedgerows and ecological networks Public rights of way, recreational use and open space

SITE PROMOTER RESPONSE

Nexus Planning on behalf of Taylor Wimpey Strategic Land

A response from Nexus Planning on behalf of Taylor Wimpey Strategic Land, as the site promoter, confirms the availability of the site and support for the emerging allocation in the Regulation 18 Plan. The response provides detailed comment on wider elements of the Local Plan, including the emerging Development Strategy, as well as further site specific detail which has been taken account of through the Development Brief work.

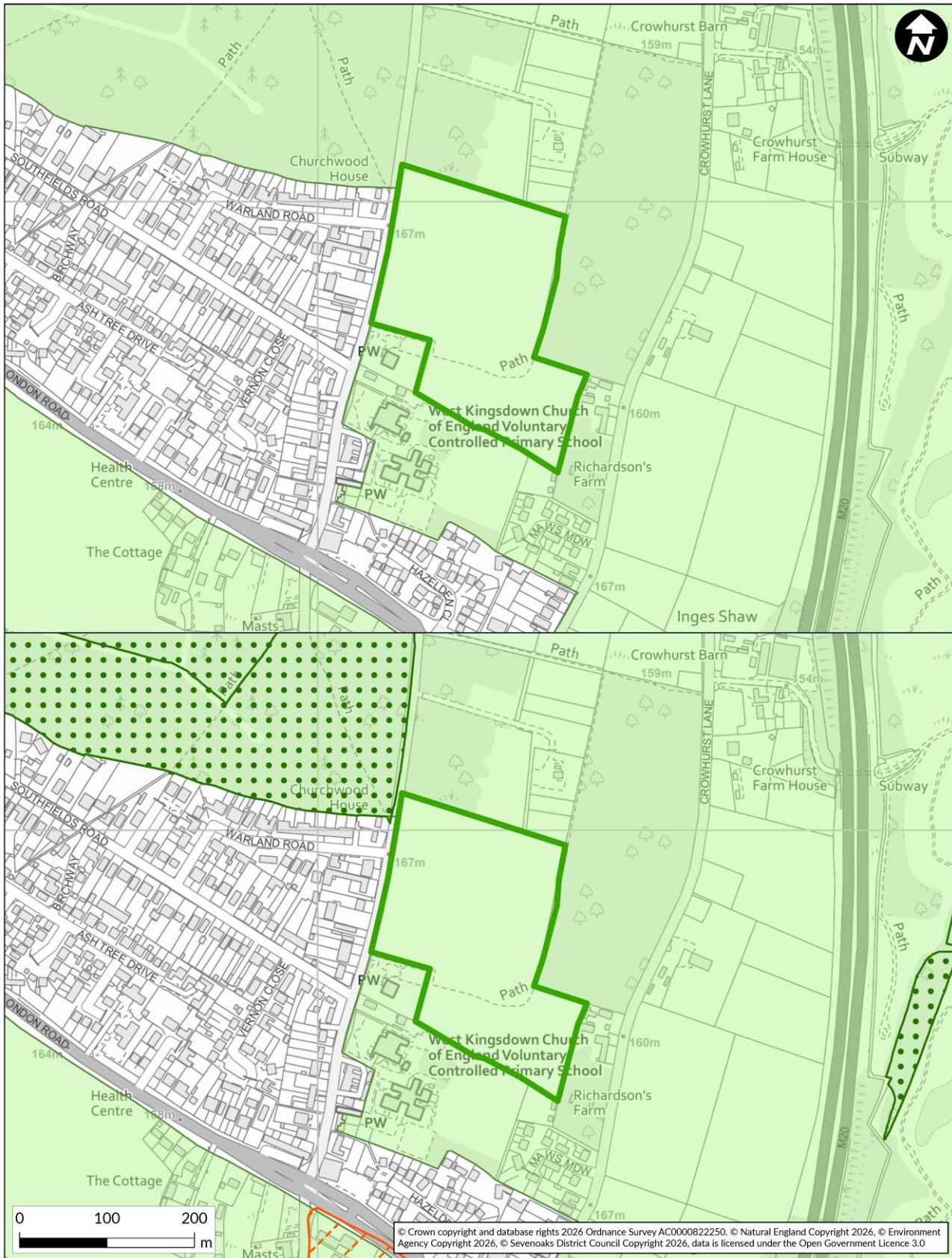
SHELAA 2026 CONCLUSIONS

Suitable?	This is a large greenfield site situated adjacent to Hextable, which is classified as a Secondary Service Settlement in the Settlement Hierarchy 2025. It is therefore considered that this site is located in a sustainable location, close to key services and facilities in Hextable. However, it is noted that the site lies over 2km from a train station. The site would require new vehicular access. 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. The Footnote 7 assessment confirms that there are no footnote 7 constraints applicable to this site. It is noted that the site lies within Grade 2 and 3 Agricultural Land Quality and partially within a mineral safeguarding area, both of which would require further consideration for any future proposals. 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. Therefore, the site is considered
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	suitable due to its sustainable location adjacent to Hextable, grey belt status and relatively unconstrained nature.
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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to Hextable and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 156 residential units.
Allocated for	156 residential units
Regulation 19 (2026) Ref	ST4-39

HO/21/00219
Land East of Fawkham Road West Kingsdown



SITE DETAILS	
SHELAA Reference	HO/21/00219
Regulation 19 Reference	ST4-40
Regulation 18 2025 Reference	WK3
Site Area (Ha)	5.11
Developable Area (Ha)	5.11
Brownfield / Greenfield	Greenfield
Planning History	None
Previous SHELAA Ref (2018)	HO90
Site Description	This is a greenfield site adjacent to the urban confines of West Kingsdown. The site comprises an area of woodland. The site is bound by Fawkham Road to the west, West Kingsdown Church of England Primary School and a church to the south and woodland to the north and east.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	160 residential units
SHELAA Conclusion	Suitable and Developable

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	Not 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	Adjacent to urban confines of West Kingsdown	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No Footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	100.0% Medium	
Agricultural Land Quality	Other - 0.66%; Grade 3 - 99.34%	
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	0.67% within 15m buffer of Ancient & Semi-Natural Woodland	
Presence of Heritage Assets	Not applicable	
Contamination Issues	No specific risk	
Noise Pollution	Noise Assessment (motorway)	
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	100.0% within 250m of West Kingsdown	
Town and Local Centres	Within 2km of West Kingsdown, Hever Road (walkable and cycle friendly)	
Train Station	Over 2km to nearest train station	

GREEN	AMBER	RED
17	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 and also abuts Priority Habitats Inventory – Deciduous Woodland to the north and 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 strongly opposes the site allocation, citing access concerns, Green Belt, traffic and congestion, emerging planning applications and sewage treatment.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent raises access concerns due to the sites location adjacent to the Primary School and other community facilities. The response also cites permitted development, sewage discharge and landscape sensitivity.
General Response	Respondents highlight that due to Fawkham Road's narrow width, lack of pavements and pinch points development of this site would worsen congestion and safety during peak periods, school runs and events, with nearby A20 flooding and Portobello crossroads being an accident hotspot noted. Public transport, local schooling, shops and health services are deemed unable to support additional households. Concerns are raised that green belt farmland and landscape character would be lost, habitats and ancient woodland harmed, and heritage assets impacted. Foul drainage, water and electricity supply are judged to lack capacity and resilience. The proposed housing density, tenure mix and grey belt policy arrangements are questioned for viability and policy compliance. Road safety enforcement and strategic planning measures are urged.

Key issues raised	Vehicular access and highway capacity Community services and social infrastructure capacity Green Belt, landscape character and setting Pedestrian, school safety and public rights of way Foul drainage and utilities Ecology, biodiversity and ancient woodland Housing capacity, density and tenure policy Heritage and cultural assets
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SITE PROMOTER RESPONSE

Savills on behalf of Bellway Homes (Thames Gateway)

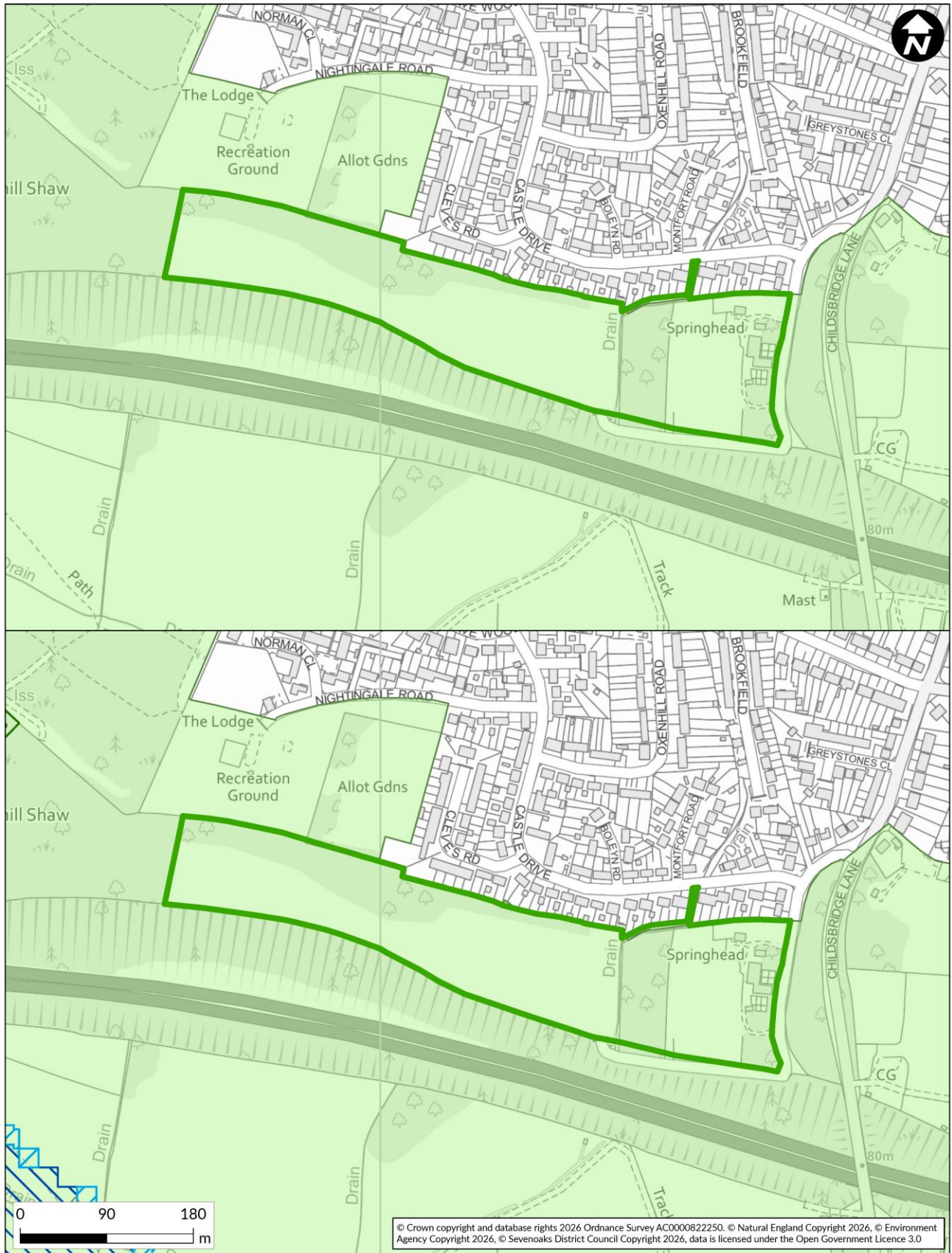
A response from Savills on behalf of Bellway Homes, as the site promoter, confirms the ongoing availability of the site for development and support for the emerging allocation in the Regulation 18 consultation. The response provides further commentary surrounding the proposals for the site as well as wider comment on the Local Plan and West Kingsdown.

SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of West Kingsdown, 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 existing key services and facilities, although it is noted that the site does not benefit from access to a train station. The site lies 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 Footnote 7 Assessment confirms that there are no Footnote 7 constraints applicable to this site. The site does not lie within National Landscapes. The site would require a noise assessment to be prepared and a new access to be provided. There are no other constraints which would make this site unsuitable. Therefore, due to the unconstrained nature of the site, its grey belt status and sustainable location, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of West Kingsdown and is considered suitable for allocation. The Development Brief work has assessed the capacity of the site and considers it capable of accommodating 160 residential units.
Allocated for	160 residential units
Regulation 19 (2026) Ref	ST4-40

HO/25/00033
Land to the west of Childsbridge Lane, Kemsing,



SITE DETAILS	
SHELAA Reference	HO/25/00033
Regulation 19 Reference	ST4-41
Regulation 18 2025 Reference	KEM4
Site Area (Ha)	6.9
Developable Area (Ha)	6.9
Brownfield / Greenfield	Predominantly greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	N/A
Site Description	The site comprises a field and residential property to the south of the settlement of Kemsing, and is bounded by Childsbridge Lane to the east and Oxenhill Shaw to the west with the M26 running to the south of the site. The site currently has 3 access points off Childsbridge Lane
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	167 residential units
SHELAA Conclusion	Suitable and Developable

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	In Green Belt adjacent to Kemsing	
Land Use (GF/PDL)	Predominantly greenfield (95%)	
Existing use	Eastern parcel - one existing house with tenants. Western parcel - no existing land use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In Green Belt adjacent to Kemsing	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No Footnote 7 constraints	
National Landscapes	Not in National Landscape	
Landscape Sensitivity	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	Not within vicinity of heritage assets	
Contamination Issues	No specific risk	
Noise Pollution	Noise assessment – traffic noise	
Air Quality	No specific risk	
Mineral Safeguarding Area	Not in the vicinity of any mineral safeguarding area	
Site Access	Existing access is taken from the spur road off Childsbridge Lane, known by the same name, into the existing property	
Network Capacity	Capacity on transport network (contributions towards improvements may still be sought)	
Settlement Classification	Adjacent to Kemsing	
Town and Local Centres	Within 2km of Kemsing, The Parade	
Train Station	Over 2km from a train station	

GREEN	AMBER	RED
18	8	1

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 highlighting the cumulative impact of development in Kemsing.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Kemsing Parish Council</u> A response from Kemsing Parish Council strongly objects to the proposed development, highlighting concerns with access, highways traffic and safety, the woodland and rural character, Green Belt harm, air pollution and noise in relation to the M26 and the impact on infrastructure such as healthcare, education, drainage and sewerage.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights concerns regarding agricultural land and landscape sensitivity, noise from the M26, sustainability and distance to public transport and the cumulative impact of development on infrastructure. <u>Kent Downs National Landscape</u> A response from Kent Downs National Landscape unit highlights that the site lies within the setting of the Kent Downs National Landscape and cites the Landscape Sensitivity Assessment in relation to the North Downs. The response provides further detailed comment regarding views into and out of the National Landscapes.
General Response	Respondents highlight that narrow lanes such as Pilgrims Way East and Childsbridge Lane, lack pavements and are not designed for heavy goods vehicles, are already associated with congestion, safety risks and recurrent flood damage. Many feel these issues would be intensified by additional housing. Further to this,

	construction traffic on rural routes is also expected to contribute to road damage, noise and safety concerns. Public transport options are limited, with infrequent bus services, distant rail stations and constrained station parking, which together leave residents largely dependent on car travel. Community and utility infrastructure is also considered to be under strain. Local schools, GP surgeries and dental practices are described as operating at or near capacity with no confirmed plans for expansion. Water supply, drainage and sewer networks are understood to have limited remaining capacity, and changes to the floodplain could increase the risk of overflows. Environmental and landscape impacts form another key theme. Respondents note that protected habitats, including chalk streams, ancient hedgerows and woodland, cannot simply be replaced through biodiversity net gain calculations. Development in the Green Belt and adjoining National Landscapes is seen as potentially harmful to landscape character, dark-sky qualities and nearby heritage assets. Finally, some respondents express worries about the consultation process itself, citing a lack of transparency, clarity of methodology and independent oversight.
Key issues raised	Highway capacity and local road safety Education, health and community services capacity Biodiversity, protected habitats and trees Public transport, station access and parking Heritage, landscape and AONB setting Water supply, drainage and foul water capacity Construction access and HGV routing

SITE PROMOTER RESPONSE

Andrew Black Consulting on behalf of Chartwell Land and New Homes 2 Ltd

A response from Andrew Black Consulting on behalf of Chartwell Land and New Homes 2 Ltd, as the site promoter, confirms that the site remains available for allocation in the Local Plan and reaffirms support for the inclusion of the site at Regulation 18. The response provides further commentary on the Local Plan as well as further site specific details, including a Vision document, which have been taken into account as part of emerging Development Brief work.

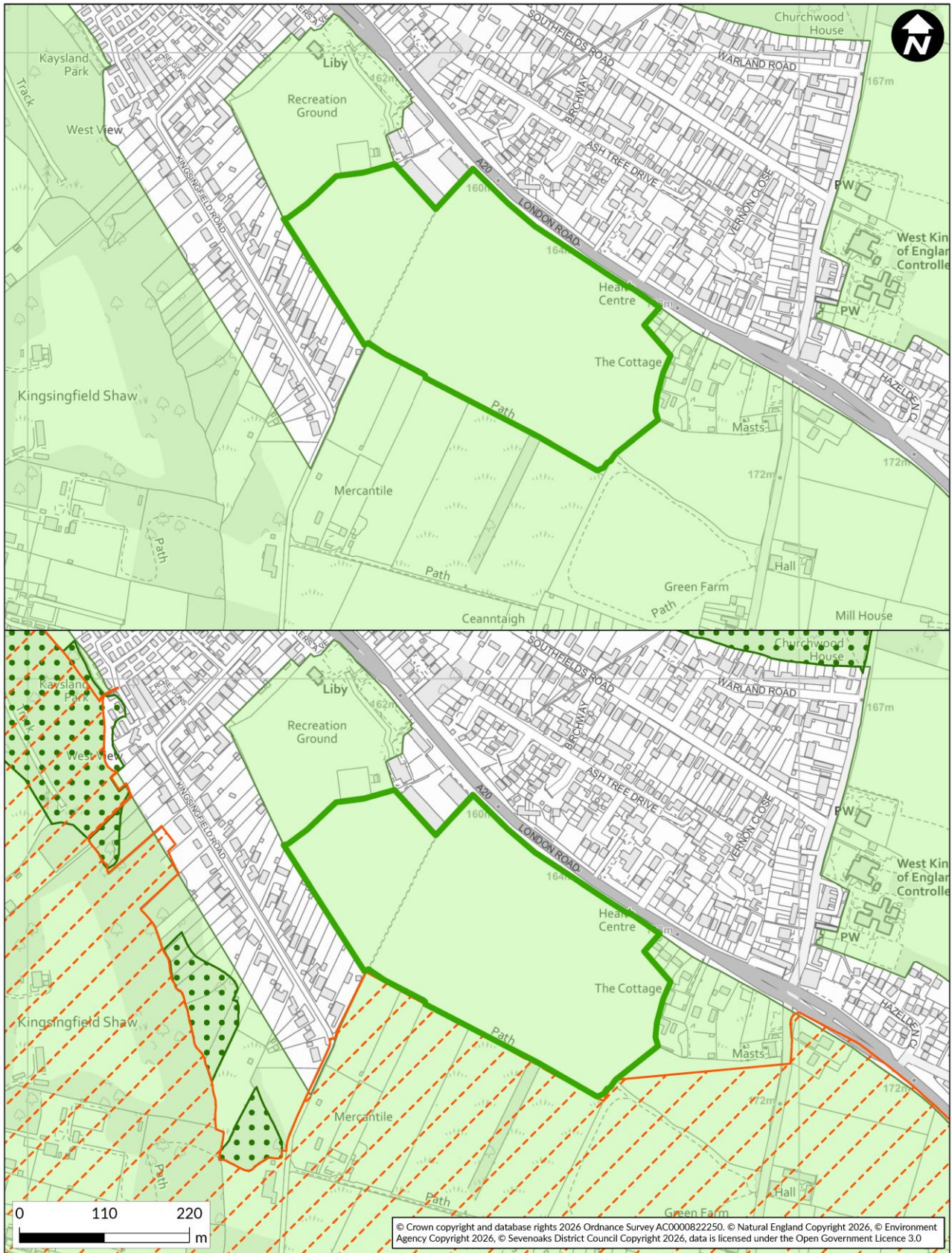
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Kemsing, which is identified as a Secondary Service Settlement in
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	the Settlement Hierarchy 2025. The site is 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 is Grade 3 agricultural land quality, both of which would need further consideration. A noise assessment would be required due to traffic noise from the M26. There are no other constraints which would make this site unsuitable. Accordingly, due to the unconstrained nature of the site, its grey belt status and sustainable location adjacent to Kemsing, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of Kemsing and is considered suitable for development. The Development Brief work assesses the capacity of the site and it is considered capable of accommodating 167 residential units.
Allocated for	167 residential units
Regulation 19 (2026) Ref	ST4-41

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



SITE DETAILS	
SHELAA Reference	HO/21/00231/B
Regulation 19 Reference	ST4-42
Regulation 18 2025 Reference	WK2
Site Area (Ha)	10.76
Developable Area (Ha)	10.76
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 and open countryside to the south and east. 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	224 residential units
SHELAA Conclusion	Suitable and Developable

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	
Footnote 7 Assessments	No Footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium – 99.65%	
Agricultural Land Quality	Grade 3 – 94.44%	
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	Potential to affect setting of Non Designated Heritage Asset and 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
19	6	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 also contains 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 objects to large scale development on Green Belt land, citing harm to agriculture, wildlife and the surrounding landscape and argues that West Kingsdown lacks the infrastructure and transport needed to support such growth sustainably. The response warns that the scheme would significantly alter the village's character due to its scale and density, place undue pressure on services like schools, healthcare and water supply and worsen existing flood risks.
Other Consultation Bodies	<u>Kent Downs National Landscape</u> A response from Kent Downs National Landscape unit highlights that the boundary of the National Landscape runs to the west of the site and therefore the site lies within the setting of the Kent Downs National Landscape. The response concludes that residential development in this location would be reasonably well contained in the landscape and the impact on the landscape and scenic beauty of the National Landscape would be low. The response makes reference to the Landscape Sensitivity Assessment. <u>Laura Trott MP</u> A response from Laura Trott MP highlights the effects of the site on the National Landscape as well as limited public transport and local services availability. <u>CPRE Kent</u> A response from CPRE Kent objects to the site, citing concerns with sustainability, flooding, sewer connection, reliance on

	private transport and the need for a defensible Green Belt boundary.
General Response	Respondents raised serious capacity concerns about utilities and services, including surface water drainage, sewer and water supply resilience, power, broadband, GP surgeries, schools and burial space. Historic flooding on Site WK2 and London Road was highlighted. Robust green and blue infrastructure was recommended. Public transport was described as limited, with infrequent bus services, no rail station and unsafe crossing points, reinforcing car dependence and underlining the need for improved pedestrian, cycle and public rights-of-way connections. Ecology and landscape character assessments highlighted the site's value within the Kent Downs National Landscape and green belt, suggesting boundary amendments and on-site biodiversity and landscape enhancements. Feedback suggested flexibility in housing density and simplified design frameworks, alongside highway improvements to manage additional traffic flow. A formal infrastructure audit was proposed to assess electricity, water, healthcare, education, transport and active travel capacity to guide future planning.
Key issues raised	- Utilities and community infrastructure capacity - Allocation scale, density and development brief requirements - Flood risk and surface water drainage - Public transport and sustainable access - Ecology, biodiversity and habitats - Landscape setting and character integration - Public rights of way, pedestrian and cycle connectivity - Highways capacity and traffic generation

SITE PROMOTER RESPONSE

Avison Young on behalf of King Edward VI Foundation

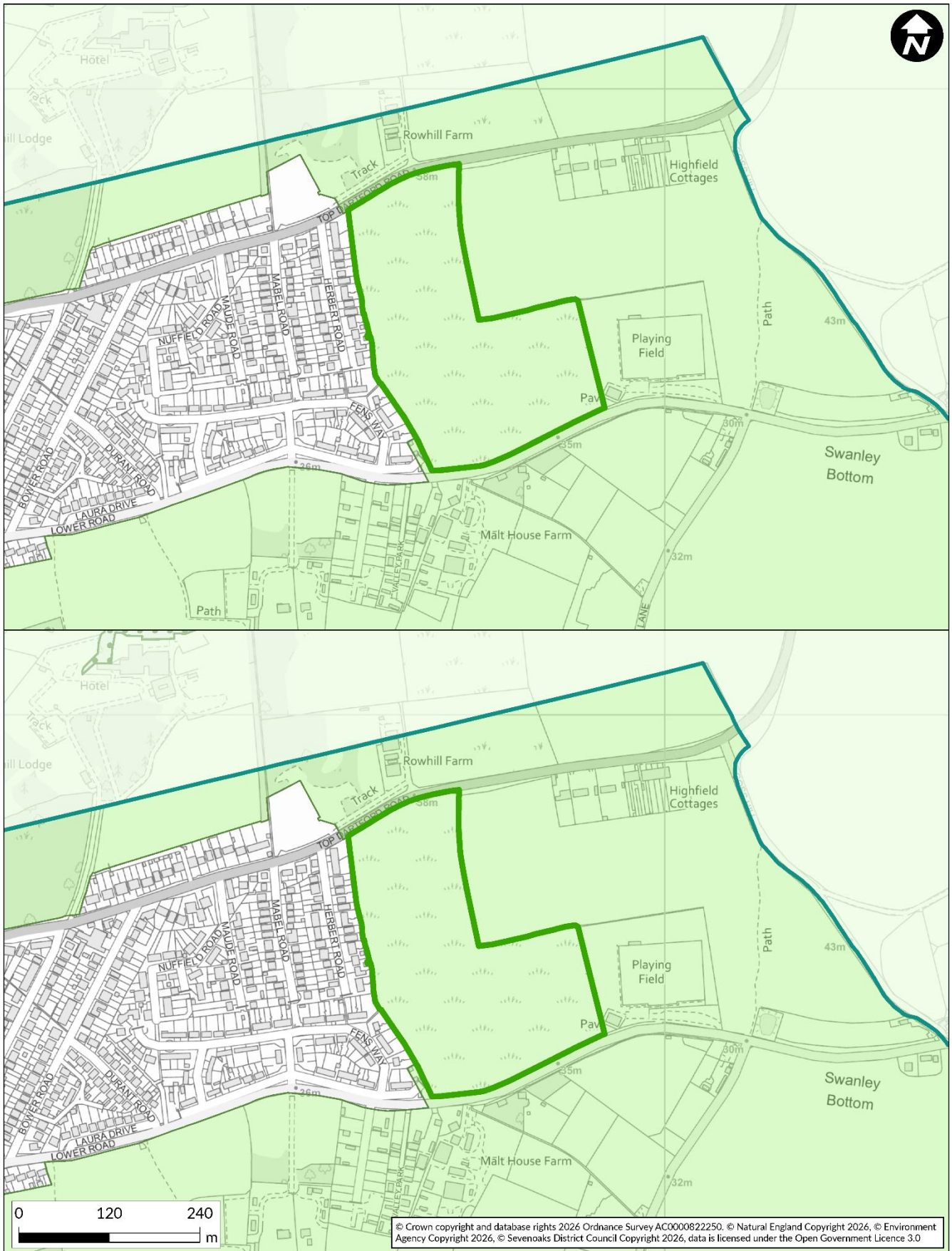
A response from Avison Young on behalf of King Edward VI Foundation, as the site promoter, welcomes the proposed allocation of the site and confirms the site continues to be promoted for inclusion and available for development within the Plan period. The response provides further site specific details, including a vision document and other evidence, as well as making comment on the wider emerging Local Plan, including on the proposed Development Strategy and a range of emerging policies.

SHELAA 2026 CONCLUSIONS

Suitable?	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. The Footnote 7 assessment has shown that there are no footnote 7 constraints applicable to this site. A new access would be required, as well as a secondary access for emergency use. The site does not lie within the National Landscapes and this reduced site boundary follows the element of the site submission which lies outside of the Kent Downs National Landscape. There are no other constraints which would make this site unsuitable. Accordingly, the site is therefore considered to be 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a grey belt site adjacent to the urban confines of West Kingsdown and is considered to be suitable for allocation. The Development Brief work has assessed the capacity of the site and is considered capable of accommodation 224 residential units.
Allocated for	224 residential units
Regulation 19 (2026) Ref	ST4-42

HO/21/00096
Meadow View (aka Fen's Farm), Top Dartford Road, Hextable



SITE DETAILS	
SHELAA Reference	HO/21/00096
Regulation 19 Reference	ST4-43
Regulation 18 2025 Reference	HEX2
Site Area (Ha)	7.61
Developable Area (Ha)	7.61
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO23
Site Description	This is a greenfield site adjacent to the urban confines of Hextable. The site currently comprises undeveloped, vacant land. The site is bound by Top Dartford Road to the north and Lower Road to the south, residential development to the west and open countryside and a playing pitch to the east. 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	238 residential units
SHELAA Conclusion	Suitable and Developable

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 use	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	In the Green Belt adjacent to Hextable	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	No Footnote 7 constraints	
National Landscapes	Not within National Landscapes	
Landscape Sensitivity	Low-medium – SW1 Swanley North including Hextable	
Agricultural Land Quality	Grade 3 (88.65%)	
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 within mineral safeguarding area	
Site Access	Requires new access	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Adjacent Hextable	
Town and Local Centres	Within 2km of Hextable, Lower Road	
Train Station	Over 2km from train station	

GREEN	AMBER	RED
18	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 aerial mapping reveals desire lines across the site, suggesting it may be used by the public for recreational purposes. Natural England advised the allocation should refer to their guidance on Greenfield and Open Space to consider whether any such provisions apply.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Hextable Parish Council</u> A response from Hextable Parish Council argued that productive arable farmland between Hextable and Wilmington serves as a vital green buffer preventing settlement coalescence and should not be lost given national food security concerns. The council also noted that building 200 homes here, far from transport hubs, would conflict with Policy H7 and that local infrastructure is inadequate. <u>Sutton-at-Hone and Hawley Parish Council</u> A response from Sutton-at-Hone and Hawley Parish Council expressed concerns that Lower Road connects to narrow rural lanes with no public transport, making the location inherently unsustainable and car-dependent. The council argued the site represents valuable farmland forming a green buffer between villages and that existing infrastructure, including roads, schools and health services, is already under significant pressure.
Other Consultation Bodies	<u>Laura Trott MP</u> A response from Laura Trott MP highlights that the site produces regular crops and should not be lost on food security grounds, and that its development risks merging Hextable with Wilmington by removing the green buffer. The response also raises concerns about the new access onto Top Dartford Road increasing peak-time congestion and station car park pressure.
General Response	Respondents highlight that the proposed development would strain healthcare, education, transport and utilities infrastructure, with full-capacity GP and dental services, oversubscribed schools and inadequate drainage lacking funded upgrade plans. Narrow

	rural lanes and the B258 already face congestion, safety and parking issues, while limited bus services and distant rail stations risk increasing car dependency. Development of 200 homes on greenfield land may erode rural character, settlement separation and biodiversity, permanently remove high-quality farmland and open habitats, and intensify surface-water flood risk. The absence of detailed, funded plans for social, transport and ecological mitigation prompts questions about the site's readiness for large-scale housing growth.
Key issues raised	Local services and social infrastructure capacity Highway capacity and local road suitability Landscape, settlement character and separation between settlements Green belt designation and loss of agricultural land Public transport accessibility and car-dependency Biodiversity, habitats and rights of way/open space Parking and rail commuter capacity Flood risk and surface water drainage

SITE PROMOTER RESPONSE

DHA Planning on behalf of Meadow View Management

A response from DHA Planning on behalf of Meadow View Management supports the site allocation in the Local Plan and confirms the site remains available and deliverable for residential development. The response makes further detailed comment in regard to housing delivery and emerging Policies, as well as including further detail regarding the site proposals and masterplanning.

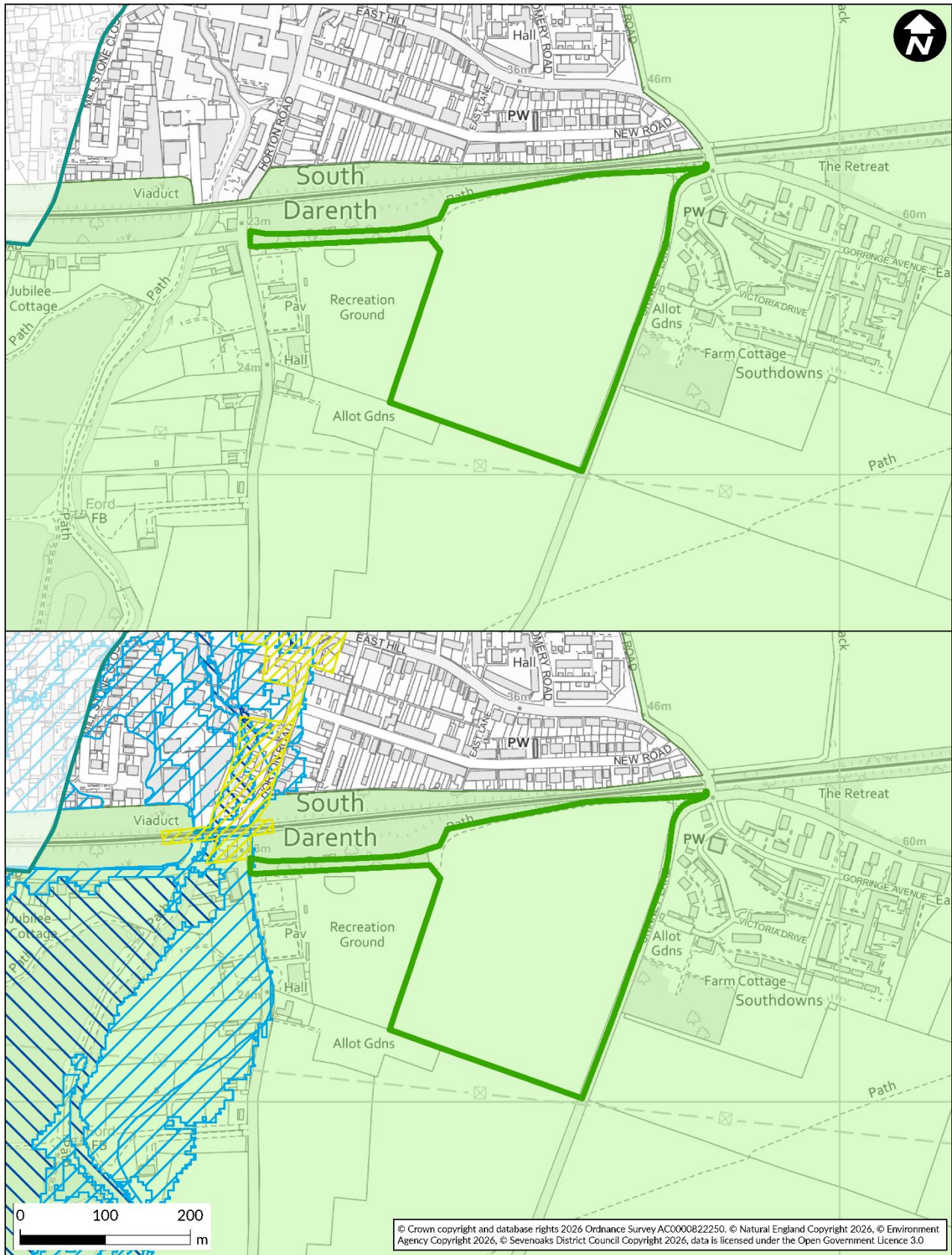
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site adjacent to the urban confines of Hextable, which is classified as a Secondary 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. However, it is noted that the site lies over 2km from a train station. The site will require a new access and the surrounding road network would require improvements in capacity. The site lies fully within the Green Belt but is considered to constitute grey belt under national policy, due to its performance against Green Belt purpose A, B and D. An assessment of NPPF Footnote 7 constraints has been
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	undertaken and these are not considered to apply to this site. The site does not lie within the National Landscapes and there are no other constraints which would make the site unsuitable, although it is noted that the site is Grade 3 agricultural land quality. The Strategic Flood Risk Assessment Level 2 identifies surface water flood issues on this site and it is considered the site could be developed if the site-specific guidance, as set out in the site sheet is followed, taking a sequential approach to locating buildings out of areas of flood risk. Therefore, due to the sites status as grey belt land, unconstrained nature and sustainable location adjacent to a Secondary Service Settlement, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to the urban confines of Hextable and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has considered the location and constraints and found the site to be capable of accommodating 238 residential units.
Allocated for	238 residential units
Regulation 19 (2026) Ref	ST4-43

MX/21/00013
Land at Horton Road, South Darenth



SITE DETAILS	
SHELAA Reference	MX/21/00013
Regulation 19 Reference	ST4-44
Regulation 18 2025 Reference	SD8
Site Area (Ha)	8.19
Developable Area (Ha)	8.19
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO128
Site Description	This is a large greenfield site adjacent to South Darent. The site is currently in agricultural use. The site is bound by the railway line and South Darent urban confines to the north, Skinney Lane and Southdowns Retirement Community to the east, agricultural land and allotments to the south and a Recreation Ground and Horton Road to the west. The site does currently benefit from an existing access off Horton Road.
Site Type	New Build
When will this development be delivered?	Years 6-10
SHELAA Yield	230 residential units
SHELAA Conclusion	Suitable and Developable

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

SHELAA ASSESSMENT		
Within Urban Confines	Adjacent South Darenth	
Land Use (GF/PDL)	Greenfield	
Existing use	No	
Existing allocation / designation	No	
Proposed use / designation	No	
Green Belt	Within Green Belt adjacent to South Darenth	
Green Belt Stage 3	Grey belt	
Footnote 7 Assessment	Presence of Footnote 7 constraint – to be addressed through Development Brief	
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	Within 200m of South Darenth Conservation Area	
Contamination Issues	Contaminated land assessment – part of the site within 250m of former landfill	
Noise Pollution	No specific risk	
Air Quality	No specific risk	
Mineral Safeguarding Area	1.29% within River Terrace Deposits	
Site Access	Existing access (contributions towards improvements may still be sought)	
Network Capacity	Limited capacity on transport network – would require improvements	
Settlement Classification	Adjacent to South Darenth	
Town and Local Centres	Over 2km from Town or Local Centre	
Train Station	Within 800m of Farningham Road	

GREEN	AMBER	RED
18	6	3

SHELAA 2026 ASSESSMENT

RESPONSE ANALYSIS – REGULATION 18 (AUTUMN 2025)

Statutory Consultees	<u>Natural England</u> A response from Natural England advises that the site comprises Grade 2 best and most versatile agricultural land. The allocation should demonstrate, in line with NPPF paragraphs 187(a)&(b) and 188, that no lower-quality land is available. The Plan should also include a more comprehensive policy on best and most versatile agricultural land, currently absent from Policy CC3. <u>National Grid Electricity Transmission</u> A response from National Grid Electricity Transmission identifies infrastructure assets in proximity to the site, comprising a 400kV overhead transmission line on the Kemsley – Littlebrook – Rowdown 1 and 2 route, and a decommissioned DC cable on the Kingsnorth – Beddington route.
Neighbouring Authorities	No responses were received from Neighbouring Authorities.
Town and Parish Councils	<u>Horton Kirby and South Darenth Parish Council</u> A response from Horton Kirby and South Darenth Parish Council objects strongly to the allocation of this site. The site is greenfield agricultural land and would represent a major expansion of South Darenth. Access via a narrow 'ransom strip' is severely constrained, and surrounding lanes including flood-prone Skinney Lane cannot accommodate increased traffic. Public transport and strategic highway capacity are already at capacity. <u>Sutton-at-Hone and Hawley Parish Council</u> A response from Sutton-at-Hone and Hawley Parish Council objects to the site allocation, describing the site as a country lane location that is inherently car-dependent with minimal public transport and no cycle infrastructure. Concerns include loss of Grade 2 agricultural land, inadequate GP provision, infrequent bus and rail services, existing peak-time congestion on the

	A2/M25 corridor, and insufficient infrastructure to support development at this scale.
Other Consultation Bodies	<u>CPRE Kent</u> A response from CPRE Kent objects to the allocation, stating that development would significantly reduce the green space between Horton Kirby and South Darenth, constituting unacceptable encroachment. The SHELAA identifies the site as best and most versatile agricultural land, and the Stage 2 Green Belt Assessment classifies it as both strongly performing green belt and grey belt (WK2).
General Response	Respondents highlighted that development of Site SD8 would extend urban sprawl beyond South Darenth into open countryside, merge Horton Kirby and South Darenth, and erode the rural settlement pattern, valued vistas and the setting of heritage assets such as the South Darenth Viaduct. They noted the site falls within the green belt on grade 2 best and most versatile agricultural land, conflicting with green belt purposes and lacking exceptional circumstances for boundary alteration. Limited public transport provision and narrow rural lanes would increase car dependence, traffic congestion, noise and air-quality impacts and raise pedestrian safety concerns. Insufficient capacity in schools, surgeries, drainage and utilities was also cited alongside potential loss of biodiversity, open space and recreational areas. Respondents suggested prioritising brownfield or grey belt sites, offering a community-led development brief and early parish engagement to address infrastructure needs.
Key issues raised	Settlement pattern, landscape and heritage impacts Green Belt compliance and boundary alteration Best and Most Versatile (BMV) agricultural land Public transport and sustainable travel provision Highways, access and local road safety Open space, recreation and biodiversity amenity Site capacity, deliverability and housing yield Infrastructure, public services and utility capacity

SITE PROMOTER RESPONSE

DHA Planning on behalf of Hawkspare Ltd

A response from DHA Planning on behalf of Hawkspare Ltd confirms ongoing support for the inclusion of this site in the emerging Local Plan. The response makes wider comment on Policies

within the Regulation 18 consultation document as well as providing further detail in relation to the site proposals as well as some more detailed masterplanning.

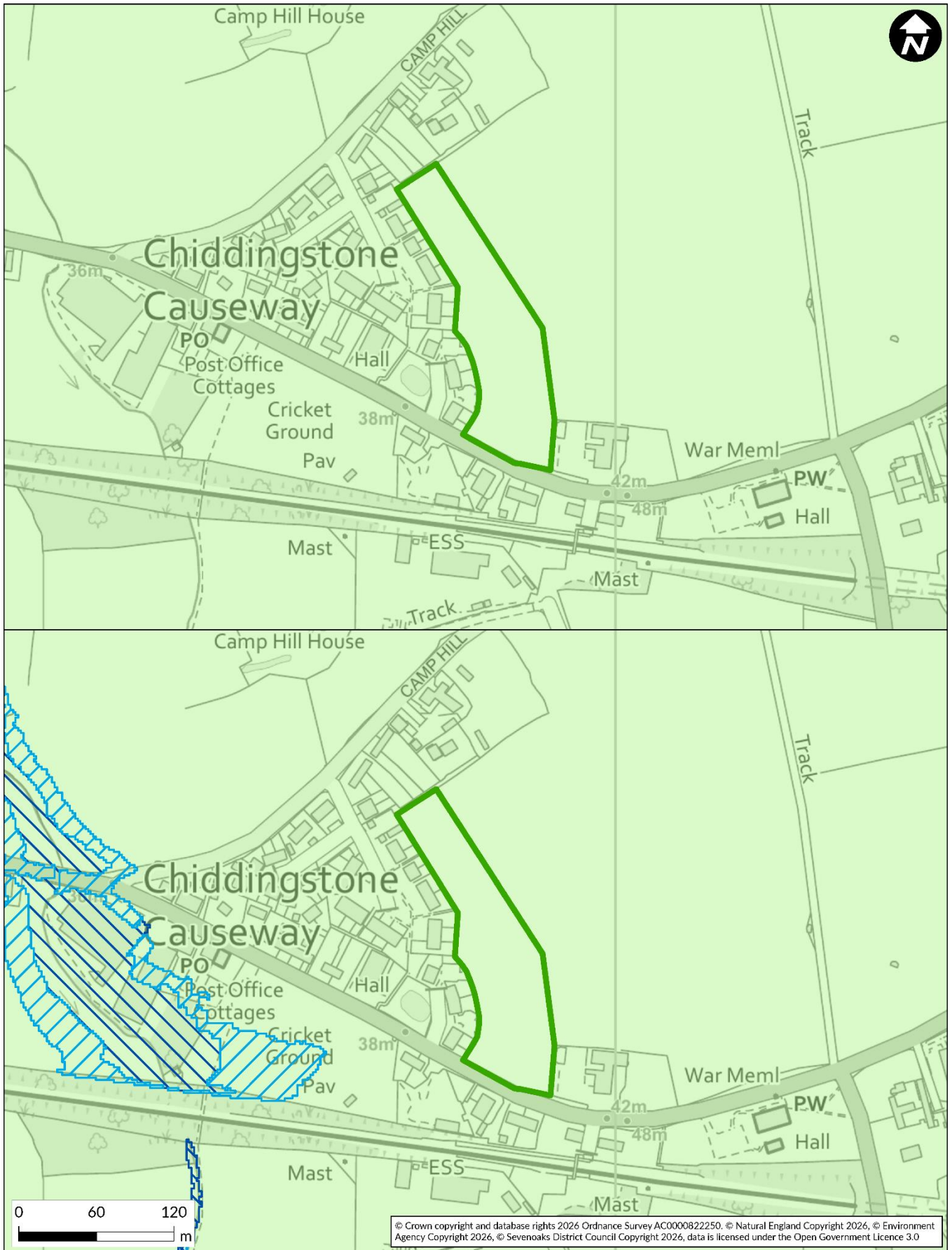
SHELAA 2026 CONCLUSIONS

Suitable?	This is a greenfield site near to South Darenth, which is identified as a Secondary Service Settlement in the Settlement Hierarchy 2025. It is therefore considered that this site is sustainably located for access to key services and facilities in South Darenth, although it is noted that the site is not directly adjacent to the settlement boundary. The site is sustainably located for public transport, being within 800m of Farningham Road station. The site lies fully within the Green Belt but is considered to be grey belt under national policy, due to its performance against the Green Belt purposes A, B and D. An assessment of NPPF Footnote 7 constraints has been undertaken and it is noted that the site has potential heritage assets and high archaeological potential. However, it is considered that this can be managed through the Development Brief work and therefore the site is considered to constitute grey belt. The site is Grade 2 agricultural land quality and lies within 200m of South Darenth Conservation Area, both of which would require further consideration. The site would also require a contaminated land assessment due to its proximity to a former landfill site. There are no other constraints which would make the site unsuitable. Therefore, due to the site's status as grey belt land, its sustainable location adjacent to a top tier settlement and its relatively unconstrained nature, the site is 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?	Developable

Overall Conclusion	Developable (Years 6-10)
	Include in Plan
SDC Comments	This is a greenfield site adjacent to South Darenth and is therefore considered to be sustainably located for access to services and facilities. The site is considered to be grey belt land and is generally unconstrained and is therefore considered to be suitable for residential development. The Development Brief has

	considered the location and constraints and found the site to be capable of accommodating 230 residential units.
Allocated for	230 residential units
Regulation 19 (2026) Ref	ST4-44

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



SITE DETAILS	
SHELAA Reference	HO/21/00188/B
Regulation 19 Reference	ST4-45
Regulation 18 2025 Reference	Part of CC3
Site Area (Ha)	1.16
Developable Area (Ha)	1.16
Brownfield / Greenfield	Greenfield
Planning History	N/A
Previous SHELAA Ref (2018)	HO421 and MX11
Site Description	This is a 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 Cottages 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	34 residential units
SHELAA Conclusion	Suitable and Deliverable

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	
Footnote 7 Assessment	Presence of Footnote 7 constraint	
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 3 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	8	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 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 site is very
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	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. The Footnote 7 assessment highlights potential heritage impacts, although this is expected to be addressed through the Development Brief work and therefore does not alter the grey belt status of the site. 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. 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. The revised site boundary increases the separation between the proposed allocation and the listed church on Tonbridge Road, whilst also bringing the projected percentage increase in housing for Chiddingstone Causeway to a level considered strategically appropriate. Therefore, the site is considered suitable.
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?	Deliverable

Overall Conclusion	Deliverable (Years 1-5)
	Include in Plan
SDC Comments	This is a grey belt site near to Penshurst Station and is considered to be suitable for allocation. The Development Brief work has assessed the capacity of the site and it is considered capable of accommodating 34 residential units.
Allocated for	34 residential units
Regulation 19 (2026) Ref	ST4-45