



# REPRESENTATIONS TO SEVENOAKS DISTRICT LOCAL PLAN REG 18 CONSULTATION

ON BEHALF OF CHIDDINGSTONE PARISH COUNCIL

DECEMBER 2025

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PREPARED ON BEHALF OF:  
CHIDDINGSTONE PARISH COUNCIL

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## 1.0 INTRODUCTION

- 1.1 KLW are instructed to prepare and submit representations to the Regulation 18 consultation on the draft Sevenoaks District Local Plan on behalf of Chiddingstone Parish Council.
- 1.2 Three sites in Chiddingstone Parish have been allocated for residential development in the draft Plan; site CC1 – Highways Depot, Chiddingstone Causeway, CC2 – Station Yard, Chiddingstone Causeway and CC3 – Land opposite Penshurst Station, to the rear of the Little Brown Jug pub, Chiddingstone Causeway.
- 1.3 These representations provide a response to each of those draft allocations, informed by consideration of the relevant draft Plan policies and by the Evidence Base documents. The representations conclude with a summary of the responses.

## 2.0 HIGHWAYS DEPOT, TONBRIDGE ROAD, CHIDDINGSTONE CAUSEWAY

- 2.1 Policy ST2 of the draft Local Plan identifies all the sites allocated for residential or mixed use development in the District. Land at the Highways Depot, Chiddingstone Causeway (site CC1) is allocated for 8 new homes; the site covers an area of 0.29 hectares (ha). The site comprises previously developed land and lies adjacent to the centre of Chiddingstone Causeway and to the limited services it offers.  
Capacity of the Site
- 2.2 It is noted that the site covers an area of 0.29ha and has been allocated for 8 dwellings, a density of approximately 28 dwellings per hectare. The Parish Council considers that the allocation has not taken account of the infrastructure and open space which will be required to be delivered within the site.
- 2.3 Land will be required to provide an internal road, possibly a surface water attenuation feature, landscape buffers to the railway line and some green space for biodiversity net

gain. Assuming that these requirements together take up 25% of the site area, the net site area will be 0.21ha.

- 2.4 At a density of 28 dwellings per hectare, this equates to up 6 dwellings. We contend that, in seeking to meet the higher housing requirement, the Council has sought to maximise the density of housing on the site, and has not taken proper account of the road infrastructure and the green infrastructure which will be required to deliver a well planned residential development.

#### Neighbourhood Plan

- 2.5 Chiddingstone Parish Council has commenced the process of preparing a Neighbourhood Plan; the designation of the parish as a Neighbourhood Plan area was confirmed by the District Council under Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 in August 2025.
- 2.6 The Parish Council does not object to the principle of the identification of the Highways Depot in Chiddingstone Causeway as being suitable for residential development. However, it would be the Parish Council's preference that the allocation for development is made in the emerging Chiddingstone Neighbourhood Plan, rather than in the District Plan.
- 2.7 Paragraph 30 of the NPPF encourages the preparation of Neighbourhood Plans and notes that:
- 'Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.'*
- 2.8 The Parish Council has already undertaken a Neighbourhood Plan community survey (October 2025) which sought the views of local residents on a range of issues. The Chiddingstone Parish Survey provides a statistically robust local evidence base that strongly opposes large-scale development within the parish. With a 72% household response rate, the survey found that:
- 92% of residents chose to live in the parish primarily for its rural character.

- The overwhelming majority opposed major housing development, citing landscape harm, traffic impact and settlement character.
- Residents expressed a clear preference for small-scale, age-appropriate housing to meet local needs rather than mass allocations.

2.9 They have also engaged with the landowners to start discussions about potential site allocations for residential development in the Parish.

#### Green Belt

2.10 The Green Belt designation washes over Chiddingstone Causeway, and this site. An assessment of the contribution that the site makes to the purposes of the Green Belt is contained within the Stage 2 Green Belt report (Arup), Stage 2 Annex Report (October 2025).

2.11 For the purposes of plan-making and decision-making, the National Planning Policy Framework (NPPF) defines 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.

2.12 The Green Belt assessment notes that the site makes no contribution to purposes a), b) and d) of the Green Belt, and performs weakly against purpose e), which supports regeneration of urban areas. As such, the report recommends that provisionally, the site can be considered to be grey belt and residential development would not be inappropriate development in the Green Belt.

2.13 The report goes on to suggest that removal of the site from the Green Belt would leave a 'hole' in the Green Belt, and therefore, as part of the development of the Local Plan spatial strategy, consideration could be given as to whether this sub-area could be removed alongside the existing adjacent washed-over village of Chiddingstone Causeway.

2.14 The Parish Council strongly objects to the proposal that the Green Belt designation be removed from the washed over hamlet of Chiddingstone Causeway.

2.15 Paragraph 145 of the NPPF states that:

*‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.’*

2.16 There is no justification at all for a change to the Green Belt boundary which would remove the designation from the hamlet of Chiddingstone Causeway. The previous Sustainability Appraisal (2017) notes that the Green Belt performance in this location is moderate, which supports its retention.

2.17 Further, there is existing policy support for development on sites within Green Belt settlements which are washed over by the Green Belt without removing a Green Belt designation. The site’s proposed development would be compliant with paragraph 154 of the NPPF, which states that limited infilling in villages is not inappropriate development in the Green Belt:

*‘limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.’*

2.18 Local planning policy supports this. Paragraph 3.7 of the Sevenoaks ‘Development in the Green Belt’ SPD (adopted 2015) states that:

*‘There may be opportunities for limited infill development within parts of villages washed over by the Green Belt which have substantially built up frontages.’*

2.19 Chiddingstone Causeway is a nuclear settlement in layout, with built up frontages along the High Street and Camp Hill. This site forms part of that area and as such its redevelopment while remaining in the Green Belt would be compliant with both national and local plan policy.

2.20 The Parish Council therefore contends that the proposed allocation CC01 should be removed from the Local Plan so that it can be allocated for development in the forthcoming Chiddingstone Neighbourhood Plan, remaining in the Green Belt and providing the opportunity for the local community to have a say in the layout and form

of the proposed development. The units delivered on the site will still contribute to meeting the District's housing need.

## 3.0 STATION YARD, STATION HILL, CHIDDINGSTONE CAUSEWAY

- 3.1 Policy ST2 allocates the site for residential development of 43 dwellings under reference CC2. The site lies to the south of the railway line, in Chiddingstone Causeway. Its existing use is part timber yard, part railway station buildings and some greenfield land.

### Capacity

- 3.2 The Parish Council supports the principle of allocation of the site for residential uses, but considers that it has been allocated for too many new homes. It is noted that the site covers an area of 1.25 hectares and has been allocated for development of 43 dwellings, a density of approximately 34 dwellings per hectare.
- 3.3 The site is subject to risk of surface water flooding: Please see the extract below from the Government's flood risk map:

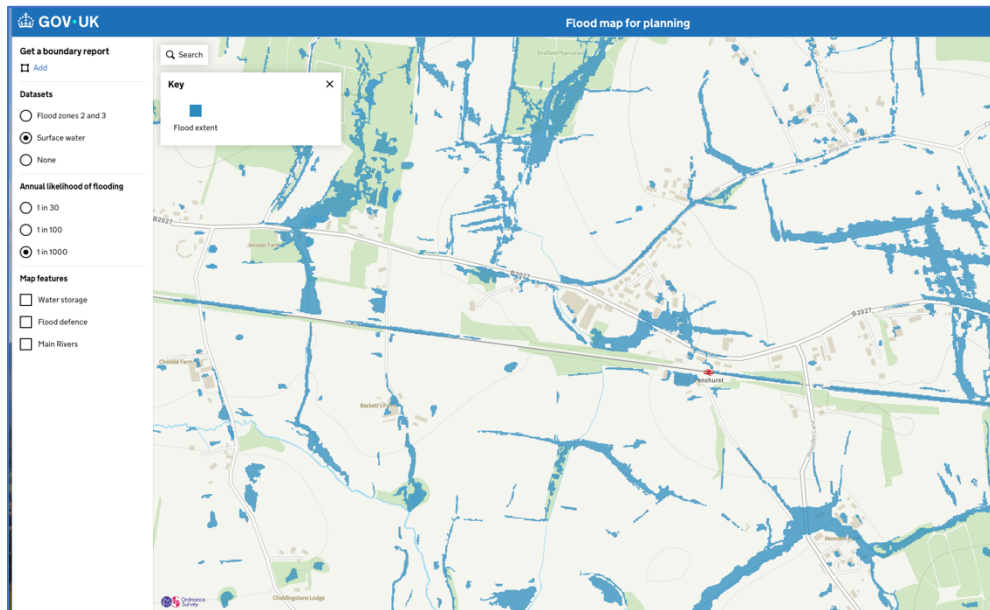


Figure 1: Surface water flood risk

- 3.4 Within the site, provision will need to be made for surface water attenuation to mitigate this surface water flood risk. Further infrastructure will also be required, including an internal road, landscape buffers to the railway line and some green

space for biodiversity net gain. Any new homes on the site will also need to be sensitively planned to ensure that they have no significant visual impact on the High Weald AONB (National Landscape), which lies some 358m to the south of the site, and has views of the site from it. As such, the layout should be landscape led, interspersed with trees and hedgerows to minimise the visual impact of the new homes. Assuming that these requirements together require up to 30% of the site area, the net site area could be a maximum of 0.88 ha.

3.5 At a density of 28 dwellings per hectare, this equates to 25 dwellings. We contend that, in seeking to meet the higher housing requirement, the Council has sought to maximise the density of housing on the site, and has not taken proper account of the road infrastructure and the green infrastructure which will be required to deliver a properly planned residential development. 25 dwellings would be a much more appropriate number for the rural location of this site, in the context of a hamlet which has an existing population of 459 people.

3.6 A further constraint to development is that the site is only accessible by vehicles from Station Road, from the south, and is severed from the village by the railway line. A pedestrian bridge connects the two sides of the railway track but this is not fully accessible to all users; people with accessibility needs such as wheelchair users or people with pushchairs would have to walk around via Moorden Lane and Station Road, where there are no pavements. All vehicular traffic associated with residential development on the site would also have to drive south up Station Hill to Moorden Lane, then back down the High Street to access the village facilities.

#### Green Belt

3.7 The Green Belt designation washes over Chiddingstone Causeway, and covers this site. An assessment of the contribution that the site makes to the purposes of the Green Belt is contained within the Stage 2 Green Belt report (Arup), Stage 2 Annex Report (October 2025), under reference CC03.

- 3.8 For the purposes of plan-making and decision-making, the National Planning Policy Framework (NPPF) defines 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.
- 3.9 The Green Belt assessment notes that the site makes no contribution to purposes a), b) and d) of the Green Belt, and performs weakly against purpose e). It notes that the site has a strongly urban character, comprising a lumber yard. As such, the report recommends that provisionally, the site can be considered to be grey belt. As such, residential development would not be inappropriate development in the Green Belt.
- 3.10 The report goes on to suggest that removal of the site from the Green Belt would leave a 'hole' in the Green Belt, and therefore, as part of the development of the Local Plan spatial strategy, consideration could be given as to whether this sub-area could be removed alongside the existing adjacent washed-over village of Chiddingstone Causeway.
- 3.11 The Parish Council strongly objects to the proposal that the Green Belt designation be removed from the washed over hamlet of Chiddingstone Causeway.
- 3.12 Paragraph 145 of the NPPF states that:  
*'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.'*
- 3.13 There is no justification at all for a change to the Green Belt boundary which would remove the designation from the hamlet of Chiddingstone Causeway.
- 3.14 Further, there is no need to remove the site from the Green Belt. Existing policy makes provision for development of sites such as the Station Yard without the need to remove them from the Green Belt.
- 3.15 The site's proposed development would be compliant with paragraph 154 of the NPPF, which states that:

*g) 'limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.'*

- 3.16 This is particularly the case because the Sustainability Appraisal Interim Report (2017) notes that the Green Belt at Station Yard performs strongly. The Green Belt designation should not therefore be removed from this area.
- 3.17 The Parish Council contends that the site should not be allocated for housing in the Local Plan. Instead, it should be allocated for residential development through the emerging Neighbourhood Plan, which will enable the local community to have a say in the future of the site. As set out above in section 2, preparation of the Neighbourhood Plan is underway, with the area designation confirmed and a community survey undertaken in October 2025.
- 3.18 The site should be removed from the draft Local Plan and an allocation for a residential scheme should be included in the draft Neighbourhood Plan. The site should remain within the Green Belt, with no resultant need to change the Green Belt boundaries.

## 4.0 LAND OPPOSITE PENSURST STATION, TO THE REAR OF THE LITTLE BROWN JUG, CHIDDINGSTONE CAUSEWAY

- 4.1 As set out in relation to the proposed allocation of sites CC1 and CC2, the Parish Council recognises that there is a significant housing requirement in the District, and is not opposed to an appropriate amount of development taking place.
- 4.2 Land opposite Penshurst Station is allocated in the draft Local Plan for 300 new homes under reference CC03. The site covers an area of 10 hectares, and lies to the east of

the hamlet of Chiddingstone Causeway. The site slopes from a height of 55m in the east, down to 38m in the west. It comprises open, agricultural land.

- 4.3 Chiddingstone Parish Council strongly objects to this allocation for a number of reasons, which we set out below.

#### Settlement Hierarchy

- 4.4 We note that the settlement hierarchy in the District has been revised. Paragraph 1.22 of the draft Plan states that:

*'The next tier down (service settlements) will be the focus for more modest growth, together with settlements, outside the National Landscape, where there is good public transport accessibility (i.e. a train station).'*

- 4.5 The three stations identified are Knockholt, Leigh and Penshurst (Chiddingstone Causeway). The allocation of sites based solely on one form of public transport does not comply with paragraph 110 of the NPPF which requires that a choice of sustainable travel options is provided.

- 4.6 The Parish Council contends that allocating a site for 300 new homes is not in any way 'modest growth'. At the 2021 census, the population of the hamlet of Chiddingstone Causeway was 459 people, living in 177 households. The scale of the proposal for the allocation of 300 homes therefore seeks to more than double the population of Chiddingstone Causeway, which is entirely inappropriate and disproportionate and can certainly not be considered to be 'modest growth'. The hamlet of Chiddingstone Causeway is a nucleated settlement which has grown organically over many years and has limited facilities and services. The proposed new development would completely overwhelm and change the character of the existing settlement to the detriment of the existing built form and open countryside.

#### Sustainability

- 4.7 In the settlement hierarchy, Chiddingstone Causeway is identified as a hamlet and is given a sustainability score of 16, in the context of a range of sustainability scores from

0 - 784. Paragraph 7.17 of the 2025 Settlement Hierarchy notes that hamlets are considered to be in unsustainable locations, characterised by a lack of services and facilities, limited public transport options and small resident populations. These factors significantly constrain the ability of these settlements to support growth in a way that aligns with the principles of sustainable development.

- 4.8 Policy ST 1 – A balanced strategy for growth – states that:  
*‘There will be a particular focus on sites that are close to services and facilities and/or well connected by public transport, walking and cycling’.*
- 4.9 Policy CC1 – Mitigating and Adapting to the Impacts of Climate Change – states that the Council will seek to ensure that development contributes *‘to the mitigation of and adaptation to climate change by being in sustainable locations....minimising the need to travel for day to day needs.... And maximum opportunities for active and sustainable modes of transport and where applicable, contributing to the delivery of walking, wheeling and cycling routes.’*
- 4.10 We contend that the site allocated for 300 new homes is neither close to services and facilities nor well connected by public transport, walking and cycling, and does not maximise opportunities for walking, wheeling or cycling. As such, it does not comply with Policies ST1 or CC1.
- 4.11 Chiddingstone Causeway lies in open countryside some 6 miles from Tonbridge, 6.5 miles from Sevenoaks and 9 miles from Tunbridge Wells. The road network comprises minor and unclassified roads, many of which are single carriageway and in a poor state of repair, with few footpaths or pavements.
- 4.12 Crucially, the station is accessed only via narrow, unlit rural lanes with no pavements, passing places or cycling infrastructure. These roads are not designed for commuter flows or park-and-ride traffic, and cannot safely absorb the transport impact of a 300-home development.

- 4.13 Penshurst functions as a rural halt, not a commuter station. It provides only one train per hour, has no direct services to London, no car park, no ticket office, and only partial step-free access.
- 4.14 Policy T1 of the draft Plan states that: through partnership working, we will:  
*6. Locate new development near public transport infrastructure, services and facilities to enhance sustainable places.'*
- 4.15 The site lies within walking distance of Penshurst train station. However, the service on this train line is limited, providing an hourly service to Tonbridge to the east, and to Edenbridge and Redhill to the west. There are no direct trains to London, nor a direct train connection to Sevenoaks. The train line affords limited sustainable travel and there are no train lines to the north and south. Critically, this service will not cater for the needs of residents of 300 new homes, many of whom would be unable to reach their destinations for work, school or other facilities by this train service.
- 4.16 The site has been allocated for development due to its proximity to the train station. Penshurst Station is ranked a 4 in the Settlement Hierarchy for rail services, although we note that other hamlets such as Bough Beech only have a ranking of 2. The additional 2 points are because Penshurst station lies within walking and cycling distance of the draft allocation site, but this does not increase the sustainability of the site overall.
- 4.17 The draft allocation completely ignores all other elements of sustainability. There are limited bus services to Tonbridge and Edenbridge. There are no cycle routes near the site, or opportunities to walk to shops and services. The Sustainability Appraisal notes that the nearest health service facilities are 5km from the site. The hamlet of Chiddingstone Causeway has one shop and a pub; most journeys for shopping, work,

education and community facilities would require a car journey to Sevenoaks or to Tonbridge. There are very limited employment opportunities in the local area.

- 4.18 In the recent Neighbourhood Plan survey, only a fraction of residents reported using rail for regular commuting, demonstrating that Penshurst Station plays no functional role as a transport hub.
- 4.19 As such, the concept that a train station transforms development in open countryside with no other sustainable transport options into a 'sustainable location' is inherently flawed.
- 4.20 Vehicular access from the site would either be onto Camphill to the north (an unclassified road with no footpath) or onto the B2027 to the south, already a very busy road which regularly endures bottlenecks in Chiddingstone Causeway and in Bough Beech to the west and Leigh to the east.
- 4.21 The site lies in a highly rural location. It would be difficult to make this more sustainable due to the distances to towns and larger villages; inevitably the majority of trips would be by private car on narrow, rural roads.
- 4.22 The site is not sustainable, public transport is limited and there are few services and facilities within close proximity. The proximity of the train station and an intermittent bus service does not make the site sustainable. The Parish Council therefore objects very strongly to the proposed allocation on the basis that the site is not a sustainable location for development.

#### Education

- 4.23 The Kent County Council 'Commissioning Plan for Education provision' (2025 – 2029) identifies that the site lies within the Sevenoaks Rural South East Area. It notes that there are four primary schools in this area, at Chiddingstone, Fordcombe, Leigh and Penshurst. The four schools between them have a planned surplus of between 11 and

21 places in each year to 2034, if no further action is taken. There is no real scope for physical expansion of any of these schools.

- 4.24 Based on figures obtained from the Department for Education (DfE), a development of 300 new homes is likely to have a pupil yield of approximately 75 primary school children, considerably more than the current capacity in these four local schools.
- 4.25 The development would not provide its own school. Chiddingstone Primary School is currently at capacity and there is some capacity at Leigh Primary School; children would therefore have to travel by car to primary schools in the area, as occurs presently. Although there is a bus service and a train service to Leigh, it is extremely unlikely that primary school aged children would use these regularly, particularly given the likely onward journeys for parents/carers to places of work.

#### National Landscapes

- 4.26 Paragraph 189 of the NPPF states that:
- 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues.'*
- 4.27 It goes on to note that:
- 'Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*
- 4.28 No consideration has been given to the provisions of paragraph 189 of the NPPF. The site lies entirely within the setting of the High Weald National landscape, which lies some 315m to the south of the site. Major development of 300 homes on this exposed, open site would be highly visible from the National Landscape.
- 4.29 Policy NE1 of the draft Plan– Landscapes and National Landscapes – states that:
- 'Development proposals in the setting of the National Landscapes should be sensitively located and designed, be consistent with National Landscape purposes, and in particular should not adversely affect transitional landscape character in the setting of the National Landscape and views, outlook and aspect, into and out of the National Landscapes by virtue of its location, scale, form or design.'*

The policy also states that:

*'Development within land that contributes to the setting of the National Landscapes should avoid or mitigate adverse impacts on the natural beauty (including dark skies and tranquillity) of the National Landscapes.'*

- 4.30 60% of residents in the Chiddingstone Parish Neighbourhood Survey 2025 stated that dark skies was an important policy to them.
- 4.31 Further, no consideration has been given to the findings of the Kent Downs National Landscape (KDNL) Rapid Review (June 2025). Chiddingstone Causeway lies within the Low Weald between the Kent Downs and High Weald National Landscapes — the very area identified in the report, commissioned for the purpose on considering inclusion of the area into the KDNL as directly contiguous with both National Landscapes.
- 4.32 The review confirms there is no discernible change in landscape quality or character across the Kent Downs boundary, meaning this is not just nearby countryside but an integral part of the protected landscape setting.
- 4.33 At this location the Kent Downs escarpment rises to the north and the High Weald begins just beyond Bough Beech to the south; the two designations are separated here by barely a kilometre of open land. The site therefore sits within the physical and visual bridge that connects these nationally significant landscapes.
- 4.34 The Kent Downs National Landscape Rapid Review (2025) specifically identifies Chiddingstone Causeway for:
- High scenic quality;
  - Intact rural landscape pattern;
  - Ecological connectivity; and
  - Perceptual tranquillity.
- 4.35 These characteristics indicate credible potential for future designation as an extension to the National Landscape. Under NPPF 176–177, great weight must be given not only

to existing National Landscapes but also to their settings and areas under active review.

- 4.36 The Rapid Review concludes that this corridor is “*highly likely to meet the criteria for designation as a National Landscape (AONB).*” It describes the area around Chiddingstone Causeway as pastoral, wooded and intimate, with historic farmsteads, ancient hedgerows, and a strong sense of tranquillity. These qualities are identical to those that underpin both existing National Landscapes. Development here would permanently disrupt that continuity and degrade a landscape already recognised as of potential national significance.
- 4.37 The setting includes Bough Beech Reservoir, Local Wildlife Sites, ancient woodland and the Polebrook Farm SSSI, together forming a dense cluster of biodiversity and heritage assets. They contribute directly to the Government's “30x30” conservation targets intended to bring 30% of the UK biodiversity under greater protection by 2030. Construction and urbanisation on the surrounding farmland would fragment habitats, weaken ecological connectivity, and erode the historic settlement pattern of Chiddingstone Causeway.
- 4.38 The proposed allocation should therefore be deleted from the Plan because not only does the site lie within the setting of the High Weald National Landscape, but it demonstrates many of the qualities of the designated land, and could in the future be designated as part of that National Landscape area.

### Green Belt

- 4.39 Section 2.5 of the Stage 2 Green Belt Assessment – Stage 2 Annex Report provides an assessment of the site, which in the Green Belt assessment is confusingly labelled CC01, and in the Local Plan, is identified as CC03. We request that for future consultations, the evidence base is updated to be consistent with the Local Plan allocation reference.

- 4.40 The site assessed in the Green Belt Assessment Annex 2 extends as far east as Compasses Road and covers an area of 33.76ha. As such its findings cannot be wholly relied on in relation to the draft allocation which only covers 10ha of the western part of the assessed area.
- 4.41 Purpose a) of the Green Belt is to check unrestricted sprawl of a large built up area. As Chiddingstone Causeway is not a large built up area, the assessment finds that the site makes no contribution to this purpose. We contend that the proposed allocation would still represent sprawl of built form into the countryside. The proposed allocation has ill-defined boundaries, particularly to the east, which would do little to prevent further development in the future. As such, the development of the site would lead to sprawl.
- 4.42 Purpose b) seeks to prevent towns from merging. The Green Belt assessment finds that the site does not form a gap between towns, and makes no contribution to preventing towns from merging.
- 4.43 Purpose c) seeks to safeguard the countryside from encroachment. Less than 1% of the site is currently covered in built form; the remainder is open countryside. There are wide views into and out of the site into the countryside and of Chiddingstone Causeway. Overall, the area has a strongly rural character. As such, the site performs strongly against purpose c).
- 4.44 Purpose d) seeks to preserve the setting and special character of historic towns. The site does not contribute to this purpose.
- 4.45 The Green Belt Assessment concludes that the area meets the purposes strongly overall. It does not meet purposes a), b) or d) and therefore can provisionally be considered to be grey belt. It performs weakly against purpose e) (regeneration of urban centres) but strongly against purpose c).
- 4.46 The assessment concludes that development of the eastern part of the site would introduce new, urbanising influences and would impact on the sense of openness but

that the western part of the site has a strong perceptual connection with the existing development in Chiddingstone Causeway to the south and west.

4.47 The allocated site comprises the western part of the Green Belt assessment sub area. Footpath FP416/1 runs along the eastern boundary of the site and affords views across the countryside in all directions. Existing low density residential development is limited to the west and south of the site. Development of the site would represent a significant incursion into open countryside.

4.48 Chiddingstone Parish Council strongly disagrees with the recommendation of the Green Belt assessment, that the site should provisionally be considered to be grey belt. The NPPF is clear that grey belt land *'excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'*

4.49 The proximity of the site to the High Weald National Landscape does provide a strong reason for refusing development in this location.

4.50 Para 155 of the NPPF states that development of homes in the Green Belt should not be regarded as inappropriate where all of the following apply;

*'The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*

*b. There is a demonstrable unmet need for the type of development proposed;*

*c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework<sup>57</sup>; and*

*d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

4.51 In respect of criterion c, paragraph 110 states that:

*'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.'*

4.52 Paragraph 115 states that:

*'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

*a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location.'*

- 4.53 The site does not offer a genuine choice of transport modes. The train service and the bus services are limited, and do not provide connections to the majority of the main settlements such as Sevenoaks and Tunbridge Wells. There is no realistic prospect of walking or cycling to other towns. Sustainable transport modes cannot be prioritised on this site due to its highly rural location. As such criterion c) cannot be fulfilled and therefore development of homes in the Green Belt in this location would be inappropriate.
- 4.54 Further, paragraph 156b requires that, under the Golden Rules, *'necessary improvements to local or national infrastructure'* are made. It would not be possible to materially improve the road network in this location due to the number and condition of the myriad of minor roads which serve this area. Further, there is no guarantee that improvements to rail services can be made. As such, the Golden Rule which requires infrastructure improvements cannot be met.
- 4.55 Further, the site fails the grey belt test in respect of Footnote 7 of the NPPF. Planning practice guidance (Ref Paragraph: 006 Reference ID: 64-006-20250225) states that: *'As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.'*
- 4.56 The proposed site allocation lies within 315m and in direct visibility of the High Weald National Landscape; National Landscapes are one of the assets identified in Footnote 7. We contend that the proposed development of 300 new homes would have such a significant visual impact on the character of the landscape and of the setting of the National Landscape that this would constitute a strong reason for refusing development.

- 4.57 The Framework is clear that, when making decisions regarding planning applications on grey belt land, authorities should ensure that the development would be in a sustainable location. This is not the case for site CC03, which should be removed from the draft Local Plan.

#### Landscape

- 4.58 The Landscape and Visual Evidence Site Assessments (Arup, November 2024), published in support of the Regulation 18 consultation, does not include an assessment of the proposed allocation at Chiddingstone Causeway. The site should not have been allocated without the benefit of the required technical assessments to support the allocation. As such, the impact that 300 new homes would have on both the character of the local landscape and on the Kent Downs and High Weald National Landscapes has not been factored into the evidence base to support the allocation.
- 4.59 Further, as set out in paragraph 4.28, the Kent Downs National Landscapes Rapid Review concluded that the area is highly likely to meet the criteria for designation as a National Landscape, and as such, the Parish Council proposes that the site is not allocated for development. The site should therefore not be allocated for development.

#### Heritage

- 4.60 The proposed allocation lies immediately to the north of the Grade II\* listed Church of St Luke, and to the south of the Grade 2 listed Stonelake Farmhouse and six other listed buildings within the vicinity of the site, some of which have direct intervisibility with the site.
- 4.61 The site also includes a Non-Designated Heritage Asset (NDHA) in the form of a WWII pillbox which forms part of the historic "GCHQ Medway Defence" intended to slow armoured advance after a coastal landing. Development within a minimum of 50 metres of this risks harming its significance and setting given its group value, rural landscape context and historic visibility integral to its original function.

- 4.62 Draft Local Plan Policy HEN1 – Protecting and Enhancing the Historic Environment – notes that:

*‘Development proposals affecting heritage assets will conserve, and where appropriate enhance, the District’s historic environment through positive management of development affecting heritage assets, including change within the setting of heritage assets, to ensure they are conserved in a manner appropriate to their significance.’*

- 4.63 The rural setting of the church contributes significantly to its importance, with uninterrupted views between the church and the open fields to the north. The Parish Council contends that the proposed development would have a significant impact on the rural setting of the Church of St Luke and that the development would not enable the church to be conserved in a manner appropriate to its significance as a Grade II\* designated heritage asset.

- 4.64 Paragraph 7.8.2 of the Sustainability Appraisal confirms this, by noting that:

*‘There would be a clear risk of impacts to the setting of a grade 2\* listed church associated with the proposed development at Chiddingstone Causeway.’*

- 4.65 As such, the proposed allocation is not compliant with Policy HEN1 and should be removed from the draft Local Plan.

#### Agricultural Land Classification

- 4.66 The site is classed as Grade 3 Best and Most Versatile Agricultural Land, which is good to moderate.

- 4.67 Paragraph 187 of the NPPF states that:

*‘Planning policies and decisions should contribute to and enhance the natural and local environment by;*

*b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;’*

- 4.68 The proposed allocation would result in the loss of 10 hectares of best and most versatile agricultural land, which would not comply with the provisions of paragraph 187 of the NPPF.
- 4.69 At a time when local food production is increasingly important to offer resilience and choice, best and most versatile agricultural land should not be lost to housing development.

#### Drainage

- 4.70 The proposed allocation site slopes down from a height of 55m in the east, to 38m AOD in the west; the western boundary lies adjacent to the back of the existing dwellings in Red Leaf Close and Richard's Close. These dwellings already suffer from regular surface water flooding and the proposed development of 300 new homes further up the clay slopes above them is very likely to exacerbate the existing problem.
- 4.71 Draft Policy W1 – Flood Risk – states that:  
*'Where required, flood protection resilience and mitigation measures must be informed by a site specific Flood Risk Assessment.'*
- 4.72 Draft Policy W2 – Surface Water Management – states that:  
*'Development that could affect drainage on or around the site must include adequate drainage provision for the management of surface water run-off, ensuring that flood risk is not increased, both onsite and elsewhere, allowing for climate change.'*
- 4.73 The Strategic Flood Risk Assessment (SFRA, Level 1, July 2024) assesses the potential flood risk associated with 55 sites, described as Potential Site Allocations, in Figure 12-1 on page 118. The proposed allocation of 300 new homes at Chiddingstone Causeway is not included within the assessment and no technical assessment of the potential flood risk associated with the proposed allocation has therefore yet taken place. This should not be left to a future stage of the planning process, but should be have been carried out as part of the Council's due diligence in allocating sites for development.

- 4.74 The fact that the site is not even included in the SFRA cannot help but make it seem that the proposed allocation at Chiddingstone Causeway has not been properly researched or thought through and that it is a late addition to the Plan by a Council which needs to increase the number of houses it delivers. The Parish Council strongly recommends that the site is not suitable for development and that it be removed from the next iteration of the Plan.

## 5.0 SUMMARY AND CONCLUSIONS

### Site Ref CC1 – Highways Depot, Chiddingstone Causeway

- 5.1 Chiddingstone Parish Council supports the principle of residential development on the Highways Depot site at Chiddingstone Causeway.
- 5.2 However, it is considered that the capacity of the site of 8 units in the draft Local Plan has not properly taken account of the constraints on the site, which include the proximity of and intervisibility with the High Weald National Landscape Area. This will need to be mitigated by the provision of landscaping. With local infrastructure, the anticipated capacity of the site should be reduced to up to 6 units.
- 5.3 The Parish Council firmly believes that neither the site nor the village of Chiddingstone Causeway, which are washed over by the Green Belt designation, should be removed from the Green Belt. National and local planning policies support the principle that the site can come forward for development as an infill site within a Green Belt settlement.
- 5.4 The Parish Council requests that the site is deleted from the Local Plan and that it is instead included as a draft allocation within the emerging Neighbourhood Plan, which is at the early stages of preparation.

### Site Ref CC2 – Station Yard, Chiddingstone Causeway

- 5.5 Chiddingstone Parish Council supports the principle of residential development on the Station yard site at Chiddingstone Causeway.
- 5.6 However, it is considered that the capacity of the site of 43 units in the draft Local Plan has not properly taken account of the constraints on the site, which include the risk of surface water flooding, and the proximity of and intervisibility with the High Weald National Landscape Area. These will need to be mitigated by the provision of sustainable urban drainage systems and landscaping. With local infrastructure, the anticipated capacity of the site should be reduced to up to 28 units.
- 5.7 The Parish Council firmly believes that neither the site nor the village of Chiddingstone Causeway, which are washed over by the Green Belt designation, should be removed from the Green Belt. National and local planning policies support the principle that the site can come forward for development as an infill/ previously developed site within a Green Belt settlement.
- 5.8 The Parish Council requests that the site is deleted from the Local Plan and that it is instead included as a draft allocation within the emerging Neighbourhood Plan, which is at the early stages of preparation.

**Site Ref CC3 – Land opposite Penshurst Station, Chiddingstone Causeway**

- 5.9 Chiddingstone Parish Council objects to the allocation of the site for 300 new homes for the following reasons:
- The scale of the proposal is inappropriate and would effectively more than double the size of Chiddingstone Causeway. The scale proposed is unlikely to deliver any new services or facilities which would benefit existing residents;
  - The recent Kent Downs Plan Rapid Review noted the proximity of the site to the High Weald and North Kent Downs National Landscapes and concluded that the area around Chiddingstone Causeway is highly likely to meet the criteria for designation as a National Landscape. The Sustainability Appraisal noted that there

would be a significant impact of development on the National Landscapes in proximity to the site.

- The Green Belt Assessment submitted in support of the draft Plan assessed a much larger parcel of land than the allocated site, and confusingly gave it a different reference number from the Local Plan allocation. The Parish Council disagrees with the assessment that the site should be considered to be Grey Belt. The site should not be designated as Grey Belt; it would represent sprawl into the countryside, its development would affect National Landscapes (a footnote 7 asset) and the site does not lie in a sustainable location. It therefore does not meet the criteria set out in national planning policy or guidance.
- The proposed scale of development will represent a significant visual intrusion into open countryside. The proposed site has no defensible buffers which would prevent further sprawl to the east; the eastern boundary is simply defined by a public footpath.
- The proposed development would have a significant impact on the setting of the Grade II\* listed Church of St Luke, as well as on other heritage assets which have direct intervisibility with the site, including Stonelake Farmhouse and other listed buildings.
- The site lies in a completely unsustainable location. The proximity of Penshurst Station is used as one measure of sustainability but this mode of transport offers a limited service to a small number of destinations. It will not prevent significant use of the private car by residents because it offers no direct services to London, Tunbridge Wells or Sevenoaks. In terms of sustainable transport, the only other option is a limited bus service. There are no realistic options to walk or cycle from the site. Local services are few (one shop, a pub) and there are limited employment opportunities nearby.

- Chiddingstone Primary School is full. A development of 300 new homes will produce a pupil yield of approximately 75 primary school children, who would need to travel to other villages to attend school, leading to more unsustainable transport options.
- The road network around the site comprises mainly unclassified lanes which are already busy and which would struggle to accommodate the additional trip generation from a scheme of 300 new homes. These roads are totally unsuitable to use for walking and cycling because cars travel quickly and the roads are narrow.
- Technical work to demonstrate that the site could be delivered has not been carried out and is not included in the evidence base to support this allocation. Neither the Strategic Flood Risk Assessment (SFRA) nor the Landscape and Visual Evidence have assessed the site, nor the impacts of its development on drainage and landscape impact respectively. The fact that the site is not even included in either technical assessment cannot help but make it seem that the proposed allocation at Chiddingstone Causeway has not been properly researched or thought through and that it is a late addition to the Plan by a Council which needs to increase the number of houses it delivers. The Parish Council strongly recommends that the site is not suitable for development and that it be removed from the next iteration of the Plan.

5.10 It is requested that Sevenoaks District Council acknowledges safe and timely receipt of these representations, and that Chiddingstone Parish Council is consulted on further progress with the preparation of the draft Local Plan.



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