



**New Edenbridge District Residents' Association
Response to the Sevenoaks Local Plan 2024**

S I T E S

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NEDRA (New Edenbridge District Residents' Association)

Sites Executive Summary

This part of our submission sets out our overarching comments on the “sites” element of the draft Local Plan 2042 as it relates to Edenbridge. It now draws on three strands of evidence: the SHELAA assessments for all 17 Edenbridge sites; the Regulation 18 development briefs for the larger proposed allocations; and an independent NEDRA Technical Review commissioned to interrogate flood risk, drainage strategy and cumulative impacts across the Edenbridge allocations.

Our review of the SHELAA and development briefs confirms that these documents remain the practical gateway through which major development in Edenbridge would come forward, setting indicative capacities, expectations for layout and design, and headline mitigation for constraints. However, across both the briefed and un-briefed sites we find that capacities and phasing are still too often driven “top down” from housing targets and promoter aspirations rather than “bottom up” from a transparent assessment of environmental limits, infrastructure headroom and realistic delivery trajectories at the settlement scale. Key dependencies for highways, education, health and utilities infrastructure are frequently pushed to later stages or left to individual planning applications, with no clear, cumulative picture of what Edenbridge can sustainably accommodate over the plan period.

The new NEDRA Consultant Led Technical Review reinforces these concerns from a flood risk and drainage perspective. It concludes that, while some individual allocations might be capable of meeting baseline requirements, the combined development of over 57 hectares within the River Eden catchment, and the addition of 800+ dwellings to an already constrained wastewater network, creates an unassessed and unacceptable risk of increased flood frequency and more frequent Combined Sewer Overflow discharges downstream. The Review highlights multiple “red flag” issues at sites including EDEN5, EDEN6, EDEN8, EDEN9, EDEN10/11, EDEN12 and EDEN14, such as building in Flood Zones 2 and 3, reliance on culverts, limited safe access and egress, high groundwater and the lack of genuinely landscape-led SuDS – and finds that the Regulation 18 strategy does not yet demonstrate compliance with the NPPF Sequential and Exception Tests. The Environment Agency flood mapping reproduced in Figure 1 on page 11 of the Review, and the historic flood outlines and surface-water risk mapping on pages 13–16, underscore how extensively Flood Zones 2 and 3 and pluvial routes intersect with the Edenbridge allocations.

Taken together, the SHELAA, the development briefs and the Technical Review show that the Local Plan does not yet provide a clear, constraint-led or climate-resilient framework for growth in Edenbridge. The cumulative impact of multiple allocations on the town’s roads, schools, health services, landscape, flood risk, sewerage infrastructure and overall character is not fully tested or clearly presented, particularly for the smaller and non-briefed sites that nonetheless contribute to the overall quantum of development in and around the town.

Our representations therefore seek focused but significant changes to the Edenbridge site evidence base. We ask that the SHELAA, development briefs and accompanying technical work be revised so that any allocations ultimately taken forward are demonstrably compliant with national flood policy, based on up-to-date hydrological and climate-change data, and genuinely infrastructure-led. Until robust, independently verified and cumulatively assessed Flood Risk Assessments and Drainage Strategies are prepared for the whole Edenbridge “cluster,” we do not consider the site selection and capacity assumptions for the town to be sound, effective or justified for either existing or future residents.



**New Edenbridge District Residents' Association
Response to the Sevenoaks Local Plan 2024**

S I T E S

NEDRA Consultant Led Technical Review

Contact: info@nedra.org.uk

NEDRA Technical Review: Edenbridge Regulation 18 Allocations

Subject: Flood Risk, Drainage Strategy, and Cumulative Impact Audit

Date: December 2025

Executive Summary

This Technical Review by the New Edenbridge District Resident's Association (NEDRA) evaluates the flood risk, drainage strategy, and cumulative impact of the proposed Regulation 18 allocations in Edenbridge.

The primary conclusion is that while individual site proposals may meet baseline requirements, the collective impact of developing over **57 hectares** within the River Eden catchment poses a significant and unmitigated risk of increased flood frequency downstream.

Key Findings and Technical Concerns:

- 1. Infrastructure Deficit:** Almost all development briefs acknowledge that the local sewerage network is inadequate. The reliance on **phasing conditions** ("Grampian conditions") is deemed insufficient, as the cumulative hydraulic load from 800+ new dwellings will overwhelm the **Edenbridge Wastewater Treatment Works (WWTW)**, increasing the risk of Combined Sewer Overflows (CSO) discharging untreated sewage into the river.
- 2. Site-Specific "Red Flags":** Numerous high-risk technical issues were identified for individual allocations, including:
 - **EDEN6 (Leathermarket):** Development in Flood Zone 3 and building over an existing culvert. Requires extensive floodplain compensation and possible de-culverting.
 - **EDEN14 (Breezehurst Farm):** Large central Flood Zone 2/3 corridor necessitating **clear-span bridges** for crossings, not culverts, to prevent upstream afflux (water level rise). Requires a verified "Dry Route" for emergency access.
 - **EDEN5 (Hospital):** Southern boundary in Flood Zone 2/3 and potential high groundwater, making safe access and soakaways highly problematic.
- 3. Policy Compliance Gaps:** Drainage strategies submitted must be rigorously scrutinized against modern standards:
 - **Data Inputs:** Reject any strategy that does not use the latest **FEH 2022** rainfall data and the **+45% (Upper End)** climate change allowance.
 - **Design:** Demand proof (via winter BRE 365 tests and groundwater monitoring (as required by the 2025 National SuDS Standards)) that the developer followed the **SuDS Hierarchy** before resorting to underground tanks or sewer discharge.

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Site-Specific Technical Audits ("Red Flags")

EDEN5: Edenbridge War Memorial Hospital

EDEN6: 1-2 Leathermarket

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Summary of Key Unmitigated Risks:

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NEDRA Technical Review: Edenbridge Regulation 18 Allocations

The Policy Landscape

Subject: Flood Risk & Drainage Planning Policy Framework

Context: Sevenoaks District Council (Edenbridge Regulation 18)

1. National Policy

These apply to every development in England. They are non-negotiable.

National Planning Policy Framework (NPPF)*

**Note - new draft version is expected of NPPF4 in December 2025 - with the aimed adoption in Summer 2026*

The National Planning Policy Framework (NPPF) (MHCLG, 2024) which includes UK Government policy on development and flood risk states:

170. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*

e) *safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

Applications for some minor development and changes of use should also not be subject to the sequential test, nor the exception test [set out below], but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.

Footnote 63 of the NPPF states:

A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

Flood Zones in England are defined as follows:

Table 1: Flood Zone Definitions

Flood Zone		Definition
Zone 1	Low Probability	Land having less than 1 in 1,000 annual probability of river or sea flooding (all land outside Zones 2 and 3).
Zone 2	Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.
Zone 3a	High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.

Zone 3b The Functional Floodplain

This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).
- Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

An FRA should be appropriate to the scale, nature, and location of the development. It should identify and assess the risk from all sources of flooding to and from the development and demonstrate how any flood risks will be managed over the lifetime of the development.

An assessment of hydrological impacts should be undertaken, including to surface water runoff and impacts to drainage networks in order to demonstrate how flood risk to others will be managed following development and taking climate change into account.

The Planning Practice Guidance, which was substantially revised in March 2015 in relation to drainage, requires that sustainable drainage systems (SuDS) should be considered and included where practicable, in line with Defra Technical Standards. The National SuDS Standards were also updated in 2025 and should be considered in any subsequent forthcoming application.

Sequential and Exception Tests

The Sequential and Exception Tests are applied in specific cases defined by UK Government policy. Their purpose is to drive development to areas of low flood risk and to support developments which improve flood risk for developments in areas at risk of flooding.

Sequential Test

Under the NPPF all new planning applications should undergo a Sequential Test in accordance with paragraph 172. This test should be implemented by local planning authorities with a view to location particularly vulnerable new developments outside of the floodplain.

Exception Test

The Exception Test is applied to sites based on the Flood Zone and the nature of the development.

The Flood Risk Vulnerability Classification table provided below in Table 2 shows which vulnerabilities are appropriate in each Flood Zone.

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification			
	Essential Infrastructure	More Vulnerable	Less Vulnerable	Water Compatible
Zone 1	✓	✓	✓	✓
Zone 2	✓	ET*	✓	✓
Zone 3a	ET*	X	ET*	✓
Zone 3b	ET*	X	X	X

*ET = Exception Test Required

User Information

When reviewing applications and their applicability, it is important to make reference to the NPPF. This is the government's overarching planning rulebook.

Paragraph 167 (Footnote 55): "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere."

The Sequential Test: Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

The Exception Test: If development must go in a high-risk area, it must provide wider sustainability benefits to the community that outweigh the flood risk, AND it must be safe for its lifetime, including the impact of climate change.

Plain English Translation:

"Not increased elsewhere": The developer cannot just protect their own houses. If their concrete driveway causes water to run off faster and flood *your* garden, they are breaking the NPFF.

The "Sequential" Argument: For sites like **EDEN6 (Leathermarket)** which is in Flood Zone 3, the Council must prove they looked at *every other possible site* in Zone 1 (Low Risk) before choosing this one. The starting point for this assessment is across the whole of the Local Authority and or County. If they haven't shown this "working out," the allocation is unsound and is open to challenge.

B. Planning Practice Guidance (PPG): Flood Risk and Coastal Change

This explains *how* to calculate the risks.

Key Policy: Developers must use the latest **Climate Change Allowances**.

Key Policy: The **SuDS Hierarchy**. Developers must prioritize "natural" drainage (soakaways/infiltration) before "mechanical" drainage (tanks/pipes).

Plain English Translation:

If a developer uses old rainfall data (from the 1990s or 2000s), they are ignoring the PPG. You can demand they use the **2022/2024 allowances** which predict much heavier storms.

2. County Policy

Kent County Council (KCC) is the **Lead Local Flood Authority (LLFA)**. They are the statutory consultee for surface water drainage on all major developments (10+ dwellings).

A. Kent Drainage and Planning Policy Statement (2019/2024)

This is the technical manual developers in Edenbridge must follow.

Discharge Rates: "Runoff rates from the site must be limited to the Greenfield runoff rates for all rainfall events up to and including the 1 in 100 year event (+ climate change)."

Urban Creep: Drainage designs must include a **10% allowance** for urban creep (future paving).

Plain English Translation:

Greenfield Rate: The developer is not allowed to discharge water into the river any faster than the grass field does right now.

The "Slowing Down" Trap: Developers often achieve this "slow rate" by holding back water in big tanks. But if those tanks are full from Day 1 of a storm, they fail on Day 2. KCC policy requires the tank to empty half its volume within 24 hours.

3. Local Policy (Sevenoaks District Council)

These are the specific policies cited in the Development Briefs you provided.

Policy W1: Flood Risk

Source: Cited in EDEN9 , EDEN6 , and EDEN14.

The Rule: Development must be directed to areas with the lowest probability of flooding. Where development is necessary in high-risk areas, it must be made safe without increasing flood risk elsewhere.

Plain English: This links back to the NPPF. For **EDEN14 (Breezehurst)**, the "safe access" clause is vital. If the emergency vehicles have to drive through flood water to get to the houses, it fails Policy W1.

Policy CC2: Low Carbon and Climate Resilient Development

Source: Cited in EDEN9 , EDEN10/11 , and EDEN14.

The Rule: New development must be adaptable and resilient to a changing climate. This often includes water efficiency (110 liters/person/day) and green infrastructure.

Plain English: A "resilient" development doesn't just mean "doesn't flood." It means it doesn't dry out and crack in summer, and it handles intense flash floods. If they propose Tarmac everywhere, they are failing the "Climate Resilient" test of Policy CC2.

Policy NE1: Landscape & Green Infrastructure

Source: Cited in EDEN9 and EDEN8.

The Rule: Development must conserve and enhance the character of the landscape.

Plain English: Drainage isn't just pipes. "Swales" (grassy ditches) and "Attenuation Ponds" are landscape features. If a developer buries all the water in plastic crates underground, they are missing an opportunity to enhance the landscape (NE1). You can object that the drainage strategy is "engineered, not landscape-led."

Policy LO 1: Distribution of Development

Development will be located to avoid areas at risk of flooding

Supplementary Planning Documents

These are documents that developers often hope you don't know about.

A. The Sevenoaks Strategic Flood Risk Assessment (SFRA)

- **What it is:** A massive technical report commissioned by the Council that maps flood risk across the district.
- **How to use it:** The SFRA will have a specific map for Edenbridge. If the developer's flood map looks "cleaner" or "less risky" than the Council's official SFRA map, ask why. They often "tweak" the models to make the site look buildable.

B. The Kent Design Guide

- **What it is:** The guide for how streets and spaces should look in Kent.
- **How to use it:** It mandates that water management should be "integrated into the street scene."
- **Objection Point:** If EDEN14 shows roads with standard gullies and hidden pipes, object using the Kent Design Guide: *"The street design fails to integrate SuDS (like rain gardens) as required by the Kent Design Guide."*

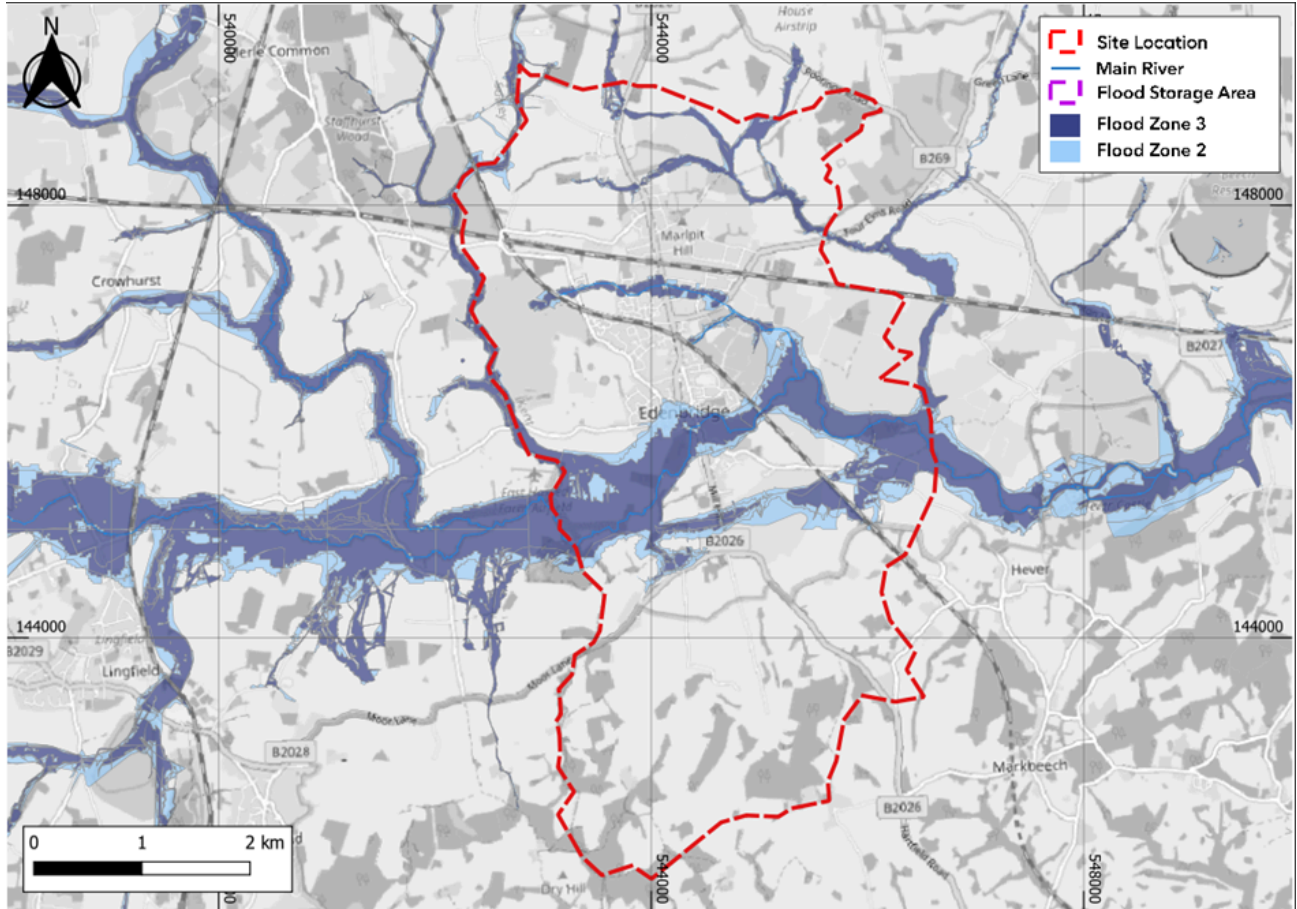


Figure 1: EA Flood Map for Planning (Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © <https://www.openstreetmap.org> and contributors. Contains public sector information licensed under the Open Government Licence v3.0)

What should a FRA and Drainage Strategy Do?

The objective of any supporting FRA is to demonstrate that the proposals are acceptable in terms of flood risk. Each report must summarise the findings of the study, and specifically address the following issues in the context of the current legislative regime:

- Fluvial/tidal flood risk
- Surface water flood risk
- Risk of flooding from other sources

Sevenoaks District Council is the Local Planning Authority (LPA) for the study area, and Kent County Council is the designated Lead Local Flood Authority (LLFA). The area of interest sits within the Environment Agency (EA)'s Kent South London and East Sussex region.

Planning Policy

Inappropriate development in a flood risk area could pose significant risk in terms of personal safety and damage to property for the occupiers of the development or for people elsewhere. The approach taken in the assessment of flood risk at the planning stage is set out in national, regional, and local planning policy and associated guidance. This section summarises the key policies and guidance relevant to the proposed development.

Core Strategy

The Core Strategy prepared by the LPA, Sevenoaks District Council (2011), sets out the policies for development in the local area. The sites lie under the jurisdiction of this LPA and therefore will be required to adhere to the Core Strategy policies. The Core Strategy (2011) document does not include any specific policies relating to the need for a Flood Risk Assessment for applications such as the proposed development – though Section 5.2.5 does note the following with relation to flood risk:

Flood risk, which is forecast to increase due to more extreme weather conditions. The Council's Strategic Flood Risk Assessment estimates the extent to which the 1:100 year flood plain will increase due to climate change and this will be taken into account in ensuring new development is not located in areas liable to flood.

Regulation 18 Local Plan

It is important to note that Sevenoaks District has a draft (non adopted) Local Plan: Regulation 18 that has been delayed due to the publication of the NPPF in December 2024. However, this document outlines policies for new development in the area, in which the development should adhere to in the future. Consultation on the Regulation 18 for Sevenoaks District closes on the 11th of December 2025.

Sources of Flood Risk

Fluvial

Flooding from watercourses arises when flows exceed the capacity of the channel, or where a restrictive structure is encountered, resulting in water overtopping the banks into the floodplain.

The EA Flood Map for Planning is presented below.

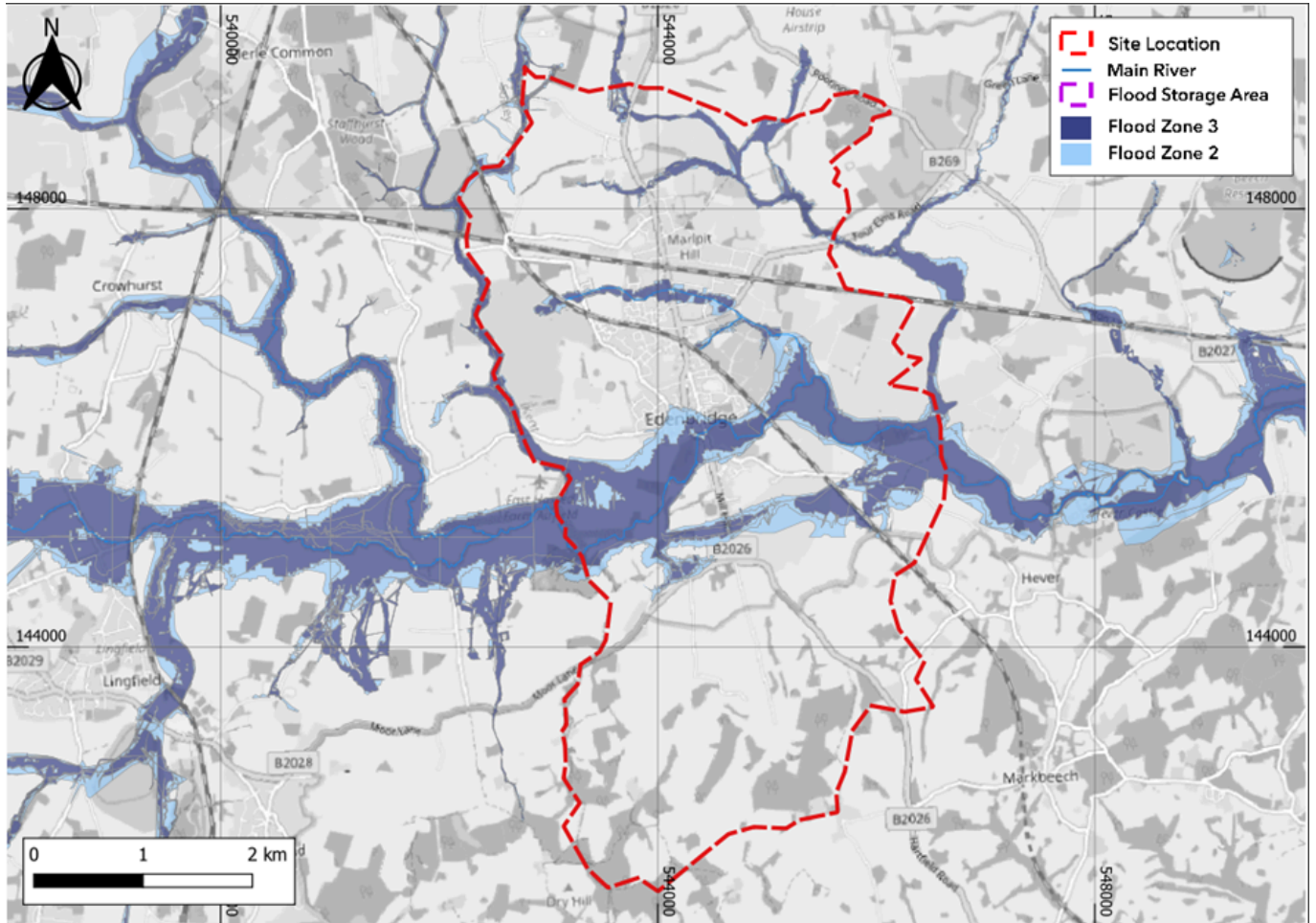


Figure 2: EA Flood Map for Planning (Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © <https://www.openstreetmap.org> and contributors. Contains public sector information licensed under the Open Government Licence v3.0)

Footnote 63 of the NPPF states:

A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

Historical Fluvial Flooding

Figure 3 below shows the EA's Historic Flood Event dataset for the Edenbridge area:

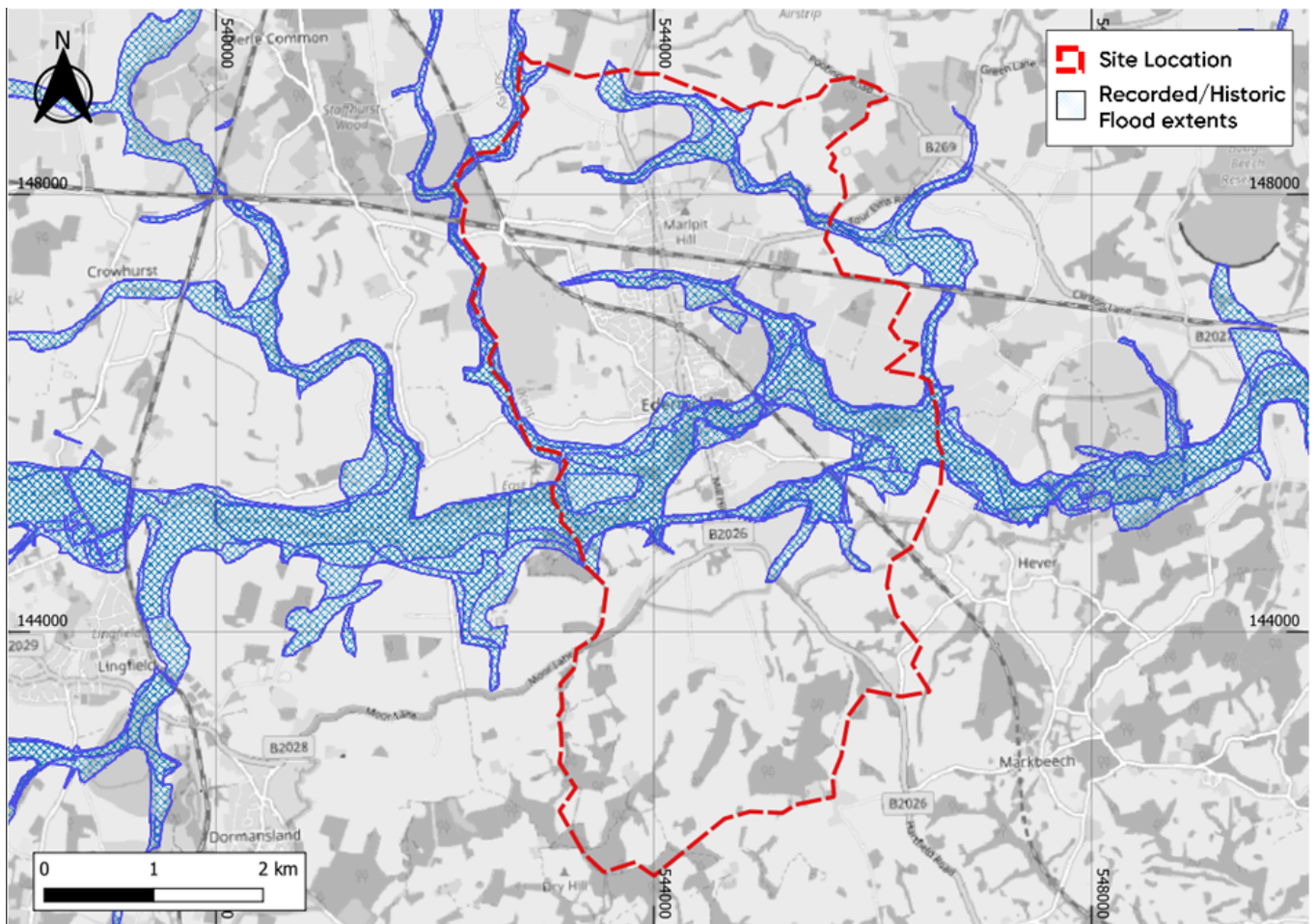


Figure 3: EA Historic Flood Mapping (Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © <https://www.openstreetmap.org> and contributors. Contains public sector information licensed under the Open Government Licence v3.0)

Pluvial

Risk of Flooding From Surface Water (RoFSW) Data

The National Flood Risk Assessment (NaFRA2), published in January 2025, has updated the Risks of Flooding from Surface Water (RoFSW) products which shows the chance of flooding from surface water to areas of land.

The RoFSW products are an assessment of where surface water flooding may occur when rainwater does not drain away through the normal drainage systems or soak into the ground but lies on or flows over the ground instead. It includes information about flooding extents and depths including the potential impact of climate change on flood risk, based on the latest UK Climate Projections (UKCP18).

Risk is displayed as one of three likelihood categories:

- High – greater than or equal to 1 in 30 (3.3%) chance of flooding in any year.
- Medium – less than 1 in 30 (3.3%) but greater than or equal to 1 in 100 (1%) chance of flooding in any given year.
- Low – less than 1 in 100 (1%) but greater than or equal to 1 in 1000 (0.1%) chance of flooding in any given year.

The RoFSW depth mapping shows the annual chance of flooding (based on the three risk categories listed above) beyond a specific depth, for depths at the following intervals from 20cm to 120cm (0.2m, 0.3m, 0.6m, 0.9m and 1.2m).

As well as present day risk of flooding from surface water, climate change scenarios have been produced to indicate the predicted impacts of climate change on future flood risk. The climate change allowances are based on the latest UK Climate Projections (UKCP18) from the Met Office, using the Representative Concentration Pathway (RCP) 8.5. A near-term epoch (2040 – 2060 “2050s” epoch) and central allowances are being used initially, to support short and medium-term decisions informed by the highest flood likelihood projections.

Present Day Scenario

Figure 4 below presents the EA's present day risk of surface water flooding dataset.

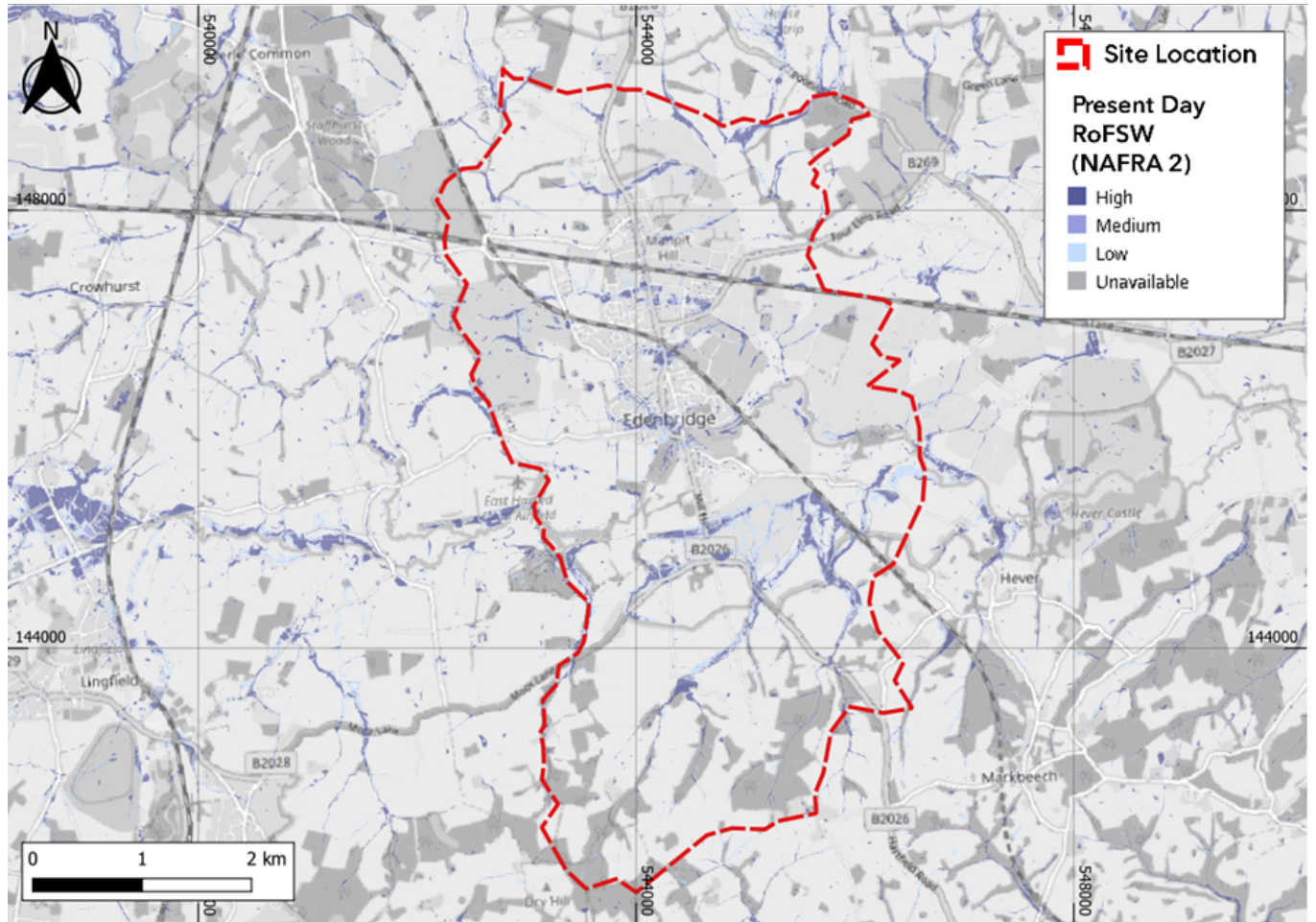


Figure 4: EA Present Day Surface Water Flood Risk Mapping (Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © <https://www.openstreetmap.org> and contributors. Contains public sector information licensed under the Open Government Licence v3.0)

Reg 18 Reviews and Information

Site-Specific Technical Audits ("Red Flags")

Use these technical summaries to scrutinize individual planning applications as they come forward. You could also make representations to the local council and local authorities as required, but typically these will be ignored if no application has actually been made.

EDEN5: Edenbridge War Memorial Hospital

- **Use:** Mixed Use (Residential + Community)
- **Key Constraint:** Southern boundary falls within Flood Zone 2 and 3; existing pond on site.

The Technical Issue	The Scrutiny Question
Groundwater Vulnerability	<p>The presence of an on-site pond often indicates high groundwater tables. If the water table is high, standard soakaways will not function. As per the 2025 National SuDS Standards there should be 1m unsaturated soil between the base of any infiltration feature and the highest recorded groundwater level at the site.</p> <p>Action: Demand winter groundwater monitoring results (borehole logs).</p>
Safe Access	<p>The site is accessed via Mill Hill. If the access route floods, the site becomes a "dry island," which is unsafe for vulnerable residents.</p> <p>Action: Request a topographical survey overlaid with 1-in-100yr + 45% Climate Change flood data. Flood hazard ratings on the site evacuation route should be provided to establish whether access/egress is safe.</p>

<p>Surface Discharge</p>	<p>Surface Water Drainage Proposals may include a connection to the public sewer to the east</p> <p>Action: Ensure that drainage hierarchy has been followed (i.e. rainwater harvesting, infiltration and discharge to watercourse have been ruled unviable) and that confirmation from main water body has been granted</p>
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EDEN6: 78-80 and 82-84 High Street, Leathermarket

- **Use:** Mixed Use (Residential + Retail)
- **Key Constraint:** Entirely in Flood Zone 2, partially in Flood Zone 3. A watercourse (culvert) runs *beneath* the site.

The Technical Issue	The Scrutiny Question
<p>The Culvert</p>	<p>Building over a culvert is generally opposed by the Environment Agency due to collapse/blockage risks.</p> <p>Action: Has a structural condition survey been done? Can the watercourse be opened up (de-culverted) to improve capacity?</p>
<p>Floodplain Compensation</p>	<p>Building here displaces flood water. For every cubic meter of concrete, a cubic meter of earth must be removed elsewhere.</p> <p>Action: Where is the <i>compensatory flood storage</i>? Is it level-for-level and volume-for-volume?</p>

<p>Sequential Test</p>	<p>Ground floor sleeping accommodation is generally resisted by the EAy in Zone 3.</p> <p>Action: Ensure all residential units are on upper floors and ground floor uses are flood-resilient (retail/commercial only).</p>
<p>Risk of Pluvial Flooding</p>	<p>Site is surrounded by areas at risk of pluvial flooding. This could have implications with regards to safe access and egress.</p> <p>Action: Ensure that the risk of pluvial flooding has been assessed appropriately, in particular with reference to hazard ratings and safe access / egress.</p>
<p>Surface Discharge</p>	<p>Surface Water Drainage Proposals may include a connection to the public sewer to the east</p> <p>Action: Ensure that drainage hierarchy has been followed (i.e. rainwater harvesting, infiltration and discharge to watercourse have been ruled unviable) and that confirmation from main water body has been granted</p>

EDEN8: Land West of Ashcombe Drive

- **Use:** Residential (approx. 90 units)
- **Key Constraint:** Slopes toward the railway line; site at high risk of pluvial flooding - potentially from external areas outside of the site.

The Technical Issue	The Scrutiny Question
Railway Asset Protection	<p>Runoff flowing onto the railway embankment can cause landslides.</p> <p>Action: Has Network Rail approved the drainage strategy? Does the site intercept 100% of surface flows at the boundary?</p>
Greenfield Rates	<p>Paving over green fields increases runoff speed. Action: Ensure discharge rates are calculated using FEH 2022 rainfall data, not outdated datasets.</p>
Railway Line	<p>A railway line bounds the south w areas of the site. If larger infiltration SuDS are proposed - suitable stand off distances must be provided from this feature in accordance with network rail requirements..</p>
Surface Discharge	<p>Surface Water Drainage Proposals may include a connection to the public sewer surrounding the site</p> <p>Action: Ensure that drainage hierarchy has been followed (i.e. rainwater harvesting, infiltration and discharge to watercourse have been ruled unviable) and that confirmation from main water body has been granted</p>

EDEN9: Land North of Skinners Lane

- **Use:** Residential (150 dwellings)
- **Key Constraint:** "Sandwiched" between the railway (north) and Flood Zone 3 (south).

The Technical Issue	The Scrutiny Question
<p>The "SuDS Squeeze"</p>	<p>There is limited space for drainage ponds outside the flood zone.</p> <p>Action: Check that attenuation ponds are NOT located in Flood Zone 3 or in areas at pluvial flood risk. If the river floods, a submerged pond provides zero storage capacity.</p>
<p>Odour & Contamination</p>	<p>Proximity to sewage works.</p> <p>Action: Request an assessment of contamination risks if the sewage works overflow into the site's public open space during a flood.</p>
<p>EA Flood map for Planning</p>	<p>EA's flood map for planning dataset indicates alterations in model outputs in the southern corner of the site</p> <p>Action: Ensure that this is discussed in the report and precautionary approaches to assessing the risk of flooding from fluvial sources is undertaken</p>

EDEN10 & 11: Land at Crouch House Road and Land at Lingfield Road

- **Use:** Residential (425 units total)
- **Key Constraint:** Large surface area; existing ponds and water features indicate complex hydro-geology.

The Technical Issue	The Scrutiny Question
<p>Hydro-geology</p>	<p>Existing ponds suggest springs or clay. Infiltration (soaking water into the ground) is likely impossible.</p> <p>Action: The strategy likely relies on massive attenuation tanks. Are these adequately sized for the "Upper End" climate change allowance? Has winter infiltration testing and groundwater monitoring been carried out?</p>
<p>Connectivity</p>	<p>The brief requires connections between the two sites.</p> <p>Action: Ensure the drainage strategies for both sites are linked, not designed in isolation.</p>
<p>Safe access / egress</p>	<p>Extensive pluvial flooding noted along existing access road east of site</p> <p>Action: Ensure that the risk of pluvial flooding has been assessed appropriately, in particular with reference to hazard ratings and safe access / egress</p>

EDEN 12: Land South West of Skinners Farm

- Use: Mixed Use : 155 dwellings
- Key Constraint : Site located within Flood Zones 2 and 3, and at high risk of pluvial flooding. Safe access / egress to the site may not be possible due to the site being potentially “cut off” due to flood risk

The Technical Issue	The Scrutiny Question
Safe access	<p>The watercourse located north east of the site may impact safe access and egress from areas to the south west.</p> <p>Action: Ensure that the FRA discusses this, and if any form of crossing is proposed, this has been designed appropriately with supporting calculations. This will also require a Flood Risk Activity Permit or Ordinary Watercourse Consent from the LLFA</p>
Railway Line	<p>A railway line bounds the south western areas of the site. If larger infiltration SuDS are proposed - suitable stand off distances must be provided from this feature.</p> <p>Action: Ensure that Network Rail have been consulted if suds features are to be located close to their assets</p>
SuDS attenuation potential	<p>If larger SuDS features are to be situated within Flood Zone 2 - there is a risk that these feature's storage may become compromised during fluvial flooding events.</p>

	<p>Action: Check if larger regional features are suitably positioned outside of flood risk areas</p>
EA Historical Flooding Dataset vs Flood Maps For Planning Dataset	<p>Large isolated area of historical flooding noted within the northern area of this (EA dataset) - which is not highlighted in the EA flood maps for planning dataset. This should be discussed, and includes the Four Elms Roadway where access to the site could be from.</p> <p>Action: Ensure that the FRA acknowledges this, as it is excluded on other datasets</p>

EDEN14: Breezehurst Farm

- **Use:** Mixed Use (450 units + employment)
- **Key Constraint:** A massive Flood Zone 2 & 3 corridor bisects the site centrally.

The Technical Issue	The Scrutiny Question
River Crossings	<p>The plan shows roads crossing the flood zone.</p> <p>Action: These must be clear-span bridges, not culverts/pipes. Pipes act as dams during floods, raising water levels upstream.</p>
The "SuDS Park"	<p>The brief suggests using the flood zone as a park.</p> <p>Action: This area will be boggy. It cannot be counted as "usable amenity space" (like a football pitch). It must be designated as wetland habitat.</p>

Emergency Route	If the central park floods, is the northern half of the site cut off? Action: Verify a "Dry Route" exists for emergency vehicles at all times.
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Surface Water Drainage - Attenuation Requirements

Outline surface water attenuation calculations have been undertaken using InfoDrainage Software (v2026.3).

Without any fixed masterplan information at this stage - several key assumptions have been made in relation to the expected impermeable surfacing associated with the construction of 2,800 dwellings across multiple sites. However, the below does provide an initial estimate of how much attenuation is expected for new, impermeable surfacing within the Edenbridge area

These assumptions are demonstrated below:

- Total Number of Houses = 2,800
- Assume 100m² of hardstanding surface (roof, patio etc) per plot
- = 280,000m² of plot level hardstanding, or 28Ha for all sites.
- +50% surfacing to account for roadways, kerbs, paths
- = 42Ha of hardstanding development potential.
- Using IH-124 greenfield calculation methodology for Edenbridge
 - SAAR - 764mm
 - SOIL - 370
- The 1 in 1 year greenfield rate across all sites is calculated to be **113.6 l/s**.

Assuming no harvesting or infiltration is viable for any site, and all hardstanding surfaces are to be positively drained to watercourse or sewer, and a CV value of 1.0 (as per the appropriate surface water drainage design criteria which states that, broadly *For surface water drainage design in Kent, the volumetric runoff coefficient (Cv). Cv is typically taken as 1.0 for developed sites unless a local lead flood authority (LLFA) or SuDS policy explicitly states otherwise*).

The InfoDrainage Quick Storage Estimate indicates that between **1033-1,197m³** of storage should be provided Per Ha of impermeable surfacing. Thank you for watching. g.

Conclusion

The New Edenbridge District Resident's Association (NEDRA) Technical Review of the Edenbridge Regulation 18 allocations concludes that the proposed collective development of over **57 hectares** within the River Eden catchment presents an unacceptable and unmitigated risk of increased flood frequency and severity downstream.

While the document details how each of the allocated sites (**EDEN5, EDEN6, EDEN8, EDEN9, EDEN10/11, EDEN12, EDEN14**) faces severe, site-specific flood and drainage constraints—including development in Flood Zones 2 and 3, building over culverts, high groundwater, and proximity to the railway—the core objection is rooted in the **cumulative impact**.

Summary of Key Unmitigated Risks:

Technical Concern	Description	Policy Failure Implication
Cumulative Flood Risk	The aggregated impact of multiple developments across the Eden catchment is not adequately assessed, leading to Peak Flow Synchronization and an increased Volumetric Burden on the river.	Failure of NPPF (Para 170: <i>not increasing flood risk elsewhere</i>) and the Sequential Test for high-risk sites.
Sewage Infrastructure	The local sewerage network and the Edenbridge Wastewater Treatment Works (WWTW) are already inadequate. The addition of 800+ dwellings will overwhelm the system, increasing untreated Combined Sewer Overflow (CSO) discharges into the River Eden.	Failure to meet Policy W1 (Safe Development) and environmental mandates.
Technical Design Gaps	Site proposals rely on outdated technical inputs (e.g., old rainfall data) and routinely fail to meet the modern SuDS Hierarchy by prioritizing underground storage over natural, landscape-led solutions (Policy NE1 and PPG).	Failure to adhere to modern FEH 2022 and +45% Upper End Climate Change allowances.
Safety and Access	Key sites like EDEN14 (Breezehurst Farm) and EDEN5 (Hospital) lack verified "Dry Routes" for emergency access during a flood event, transforming them into unsafe "dry islands."	Failure of Policy W1 and the second limb of the Exception Test (demonstrating safety for the lifetime of the development).

Overall Conclusion

NEDRA asserts that the current Regulation 18 plan for Edenbridge is **technically unsound** from a flood risk and drainage perspective. The local planning authority is being asked to permit development that fundamentally contradicts national policy by failing to:

1. **Avoid** development in high-risk areas (Sequential Test).
2. **Mitigate** flood risk to surrounding areas (Not increased elsewhere).
3. **Ensure Safety** for residents throughout the development's lifetime (Exception Test).

The document serves as a comprehensive technical toolkit, empowering residents to object to the allocations until rigorous, independently verified, and cumulatively assessed Flood Risk Assessments and Drainage Strategies are produced for the entire "Eden Cluster."



**New Edenbridge District Residents' Association
Response to the Sevenoaks Local Plan 2024**

S I T E S

NEDRA Views on Sites

Contact: info@nedra.org.uk



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN1 – Garage Courts to the North of The Plat

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN1 is a very small brownfield back-land site of approximately 0.05 ha, currently in use as garage courts and hardstanding behind existing residential properties fronting The Plat. It lies entirely within the urban confines of Edenbridge and within a Mineral Safeguarding Area. The Council proposes allocation for 5 residential units at 50–150 dph, to be delivered in years 1–5 of the plan period.

We recognise that this is previously developed land in a broadly sustainable location close to the town centre and stations, and that efficient use of such land is encouraged by national policy. However, we are concerned that the assessment and allocation as a “deliverable” site in years 1–5 is not yet supported by proportionate evidence and therefore fails the Regulation 19 Tests of Soundness, particularly in relation to “justified” and “effective” status.

Positively Prepared

The reuse of an existing garage court within the urban confines supports the principle of making effective use of brownfield land. Nevertheless, a positively prepared plan must also take proper account of the needs of existing communities, including residential amenity, **realistic access** arrangements, parking, and **safe operation** of the local highway network.

The current assessment gives no indication that the plan-making process has balanced the loss of existing off-street parking/garaging against the likely increase in on-street parking and highway impacts in The Plat, which is a constrained residential cul-de-sac. Nor is there any evidence that the implications of the very restricted carriageway width and existing parking pattern have informed any site capacity or access testing.

Justified – Evidence Base, Capacity and Site Constraints

1. Internal inconsistency in site area/capacity

The Site Details state a site area of 0.05 ha but a “developable area” of 0.1 ha, which is larger than the site itself. This inconsistency raises questions around the calculation of developable capacity and the density range applied. There is no evidence provided of a design-led capacity study that tests realistic building footprints, access, parking, turning and amenity space within the constrained back-land geometry.

2. Residential character and townscape

The site is a rear court behind existing dwellings on The Plat. There is no analysis of how introducing 5 new units in this back-land location would affect the prevailing grain and character of the street or the relationship with existing gardens and rear elevations. The conclusion that the site is “relatively unconstrained” does not appear to consider the tight urban block, existing garden relationships, and the need to avoid overdevelopment and loss of privacy to surrounding properties.

3. Loss of existing garaging/parking

The existing use as garages and hardstanding performs a functional role in meeting local parking needs. The assessment records the existing use but does not address the impact of losing these spaces, nor does it test whether displaced parking can be safely accommodated on The Plat. In a cul-de-sac environment this may materially affect highway safety, access for emergency and service vehicles and general residential amenity. These are material planning considerations that should inform whether 5 units is a justified capacity.

4. Suitability of the access route via The Plat

The Plat is a very tight residential road, with on-street parking typically occupying one side of the carriageway and effectively **allowing only one vehicle at a time to pass**. There is no evidence that the width, alignment, and current parking patterns have been assessed against the demands of:

- Construction traffic, including delivery lorries and heavy plant.
- Daily use by the occupiers of five new dwellings, visitor parking, and servicing.
- Safe and convenient access for refuse, emergency, and service vehicles.

How development vehicles, including large construction lorries, are expected to access and egress the site via The Plat has not been explained. Without a swept-path and capacity assessment, the assumption that this is a straightforward and suitable access is unproven.

Effective and Deliverable (Years 1–5)

1. Availability and landowner commitment

The SHELAA notes that the site was identified through the Settlement Capacity Study and **that landowner permission has been sought, with further work to be undertaken to confirm inclusion and achievability**. No information is given on ownership, developer interest, or legal constraints, and key fields for anticipated commencement and completion dates are left blank. Treating the site as “deliverable (years 1–5)” appears premature when basic availability and achievability evidence is still outstanding.

2. Access during construction and operation

Given the very tight nature of The Plat, with parking down one side and only single-vehicle width available along much of its length, there is a real question as to whether construction traffic can safely and practically reach the site without unacceptable disruption or risk to residents and highway safety. If construction access cannot be agreed or managed without severe local harm, the site’s deliverability within the first five

years is doubtful. The plan does not provide any evidence that this critical issue has been assessed.

3. Contamination and former landfill

The assessment records that the site requires a Contaminated Land Assessment due to its former use and proximity to landfill. There is no indication that any preliminary investigation has been undertaken. For a small, tight site, the nature and cost of any remediation could materially affect viability and timing. Until at least a desk-top and preliminary risk assessment are produced, effective delivery in the first five years cannot be assumed with confidence.

4. Mineral Safeguarding Area

The site lies entirely within a Mineral Safeguarding Area for River Terrace Deposits. The assessment acknowledges this but treats it only as an issue for later consideration. There is no evidence of engagement with the relevant minerals planning authority or of any assessment as to whether prior extraction is necessary or feasible. This could delay or constrain development and should be understood before categorising the site as readily deliverable.

5. Infrastructure and parking impacts

The conclusion that there is “capacity on the transport network” with possible contributions towards improvements is generic and not specific to this narrow residential cul-de-sac and the loss of off-street parking. Without clear evidence on junction capacity, on-street parking stress, refuse access and safe manoeuvring within The Plat, the assertion of ready deliverability is not fully evidenced.

Consistency with National Policy (Design, Amenity, Highways and Land Use)

National policy on making effective use of land and on small sites within existing settlements is accompanied by clear requirements to:

- Ensure high quality design that respects local character, density, and amenity.
- Promote safe and suitable access for all and avoid unacceptable impacts on highway safety.
- Take contamination and land stability into account at the plan-making stage where they may affect deliverability.

At present, the allocation for EDEN1 is not supported by a design-led capacity and access study, a proportionate appraisal of contamination, or robust analysis of parking and highway safety implications on The Plat. Simply deferring all these matters to the application stage does not meet the expectation that local plans themselves should be underpinned by a proportionate evidence base and that allocations should be capable of being developed in accordance with the National Planning Policy Framework.

Amenity, Access, and Parking

There is no assessment of:

- Overlooking/overbearing effects on existing homes whose rear elevations and gardens directly adjoin the garage court.
- Noise and disturbance arising from intensified access, turning, and parking movements in a tight back-land location.
- The impact on on-street parking stress in The Plat arising from the loss of garage spaces and increased demand from five additional dwellings.
- The specific implications of The Plat's physical constraints (parking along one side and single-file working) for safe access by construction vehicles, refuse lorries and emergency services, both during and after development.

These amenity and highway impacts are material planning considerations. Without a clear, design-led site capacity and access appraisal, the assumption that 5 units is acceptable appears speculative.

Contamination and Mineral Safeguarding

The need for contaminated land assessments is explicitly noted, arising from both the existing garage use and proximity to landfill. There is no indication that the likely remediation measures, abnormal costs, or programme implications have been explored, despite the site being categorised as “deliverable” in the first five years.

Similarly, being wholly within a Mineral Safeguarding Area requires early clarity on whether minerals will be sterilised and whether prior extraction is practicable or necessary. The absence of such assessment at plan stage undermines confidence that the allocation is effective and consistent with minerals policy.

Cumulative Impact on Edenbridge

While EDEN1 is small in isolation, Edenbridge is expected to accommodate a significant share of the District's overall growth. The Plan should demonstrate that cumulative effects on local infrastructure, traffic, parking, and the character of established residential streets have been tested.

In this context, allocating a constrained back-land site that removes existing parking, relies on a very narrow access road, and is assumed to be delivered early in the plan period, risks compounding pressures on local residents, disproportionate to the modest housing yield.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN2 – Land to the Rear of Stanholm, Mill Hill

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN2 is a 0.35ha greenfield back-land site within the urban confines of Edenbridge, to the rear of Stanholm on Mill Hill. It is surrounded on all sides by existing residential development and is currently vacant and undeveloped, with access shown via a long, narrow route from Mill Hill. The Council proposes allocation for 5 residential units as a “deliverable” site in years 1–5 of the plan period and concludes that, due to the “unconstrained nature of the site”, it is suitable and deliverable.

We recognise that the site is centrally located, close to services and within walking distance of Edenbridge Town station. However, the assessment appears to underplay the greenfield nature of the land, the tight back-land geometry, the constrained access, and the policy requirements arising from its location within the Conservation Area, and in our view does not yet satisfy the Regulation 19 Tests of Soundness, particularly in relation to being “justified”, “effective” and “consistent with national policy”.

Positively Prepared

A positively prepared plan should meet development needs while appropriately safeguarding the character and amenity of existing neighbourhoods and making efficient use of land. The Council’s own evidence records this as a greenfield site that is vacant and undeveloped, lying within the Edenbridge Conservation Area and within 200m of seven listed buildings.

Despite this, the SHELAA treats the land as effectively unconstrained and proposes a low yield of 5 dwellings without explaining how this balances the protection of an open green back-land space, the Conservation Area setting, the impacts on surrounding residents and the need to prioritise previously developed land. There is no indication that alternatives have been properly compared, or that localised impacts on Mill Hill and adjoining homes have informed the allocation.

Justified – Evidence Base, Capacity and Site Constraints

1. Greenfield back-land within a built-up block

The site is entirely greenfield and forms a substantial open parcel to the rear of homes along Mill Hill and Fairfield Close. Bringing new built form into this back-land position

will erode a remaining piece of open land within a dense residential block. There is no landscape or townscape analysis demonstrating that the loss of this open “green lung” is acceptable in character and amenity terms, or that other, less sensitive sites have been exhausted first.

2. Capacity and density

On a site area of 0.35ha, the proposed yield of 5 dwellings equates to a gross density of around 14 dwellings per hectare, significantly below the range usually expected in such a central, sustainable location. The SHELAA provides no design-led capacity work to explain how only 5 units represent either an appropriate response to heritage and character constraints or an efficient use of land. The absence of indicative layouts or parameters leaves uncertainty about how access, parking, turning, private gardens and separation distances can be reconciled with neighbouring amenity and Conservation Area considerations.

3. Heritage-sensitive design requirements

The site lies within the Edenbridge Conservation Area and close to several listed buildings, so development is likely to require a careful, heritage-sensitive design approach. This will influence layout, scale, materials, and landscaping and may introduce additional design constraints and costs. The SHELAA notes that these matters “may need further consideration” but there is no proportionate heritage or townscape appraisal and no analysis of whether a scheme of 5 dwellings can be accommodated without harm to the character and appearance of the Conservation Area.

4. Access via Mill Hill

Access is said to be via an “existing access off Mill Hill.” The plan shows this as a long, narrow route passing between existing buildings to reach the back-land parcel. There is no evidence of a highways or swept-path assessment addressing:

- The width and geometry of this access for safe vehicle movements.
- Pedestrian safety where the access runs alongside or between residential properties and the Stanholm home.
- Visibility at the junction with Mill Hill and the interaction with existing traffic and on-street parking.

Without such work, the assumption that access is straightforward is not supported by proportionate evidence.

5. Residential amenity of surrounding properties

The site is enclosed by existing dwellings on all sides. New houses and associated activity at the centre of this block are likely to introduce overlooking, overbearing relationships, noise, and disturbance from vehicle movements along the access and within the site, and loss of open outlook. None of these amenity issues is considered in the SHELAA conclusions, despite being clear material planning considerations that should inform whether development here is justified.

Effective and Deliverable (Years 1–5)

1. Availability and developer interest

The Council's summary records that the site has been submitted by the landowner, with assumptions that it will be available and commence in years 1–5 and completed within 3 years. There is, however, no developer involved and all timescales are expressly recorded as SDC assumptions rather than firm commitments. Treating the site as fully "deliverable" in the first five years on the basis of assumptions alone does not meet the NPPF's requirement for clear evidence of availability and realistic lead-in times.

2. Construction access and practical deliverability

The narrow back-land access raises serious questions about how construction traffic, delivery lorries and heavy plant would reach the site without unacceptable disruption to neighbouring residents, the Stanholm home and users of Mill Hill. There is no evidence of construction management, temporary traffic control, or alternative access solutions, and no acknowledgement that construction access constraints may affect viability or programme. For a small scheme of 5 units, complex access arrangements could easily render the site unattractive to developers, casting doubt on its early deliverability.

3. Infrastructure and network capacity

The SHELAA states in generic terms that there is "capacity on the transport network (contributions towards improvements may still be sought)" and that the site "benefits from an existing access off Mill Hill." This is not place-specific evidence addressing localised junction capacity, on-street parking conditions, or the needs of refuse and emergency vehicles using the long, narrow access. Without such work, the conclusion that the site is readily deliverable in years 1–5 is not robust.

4. Viability and abnormal costs

While the Council notes "no constraints that could render the site financially unviable," this appears to be a high-level judgement that does not account for potential abnormal costs associated with heritage-sensitive design, sensitive landscaping, possible acoustic and privacy mitigation, or complex construction logistics via a restricted access. Given the modest yield, such costs could materially affect viability and timescales.

Consistency with National Policy

National policy expects local plans to:

- Prioritise the reuse of previously developed land before greenfield where possible in sustainable locations.
- Require high-quality design that responds to local character, including Conservation Areas and the setting of heritage assets.
- Ensure safe and suitable access for all users, with no unacceptable impact on highway safety.
- Demonstrate that allocated sites are developable and deliverable with a proportionate and up-to-date evidence base.

In the case of EDEN2, the plan allocates a greenfield back-land parcel within a Conservation Area, without a clear explanation of why this is preferable to other options, without a heritage-sensitive, design-led capacity assessment, and with only generic statements on access and network capacity. This raises concerns about consistency with the NPPF's approach to effective use of land, heritage, amenity, and sound site selection.

Amenity, Access, and Parking

The SHELAA does not assess:

- The impact of a new access road and car parking serving 5 dwellings running close to existing homes and the Stanholm property, including noise, disturbance, and loss of privacy.
- The effect on on-street parking and manoeuvring on Mill Hill arising from additional turning movements at the site access and visitor parking demands.
- The ability of refuse, delivery and emergency vehicles to safely enter, turn and exit using the long, narrow access.

These localised amenity and highway impacts are likely to be significant for nearby residents and for the functioning of Mill Hill, yet they are absent from the evidence relied upon to support the allocation and its classification as “deliverable” in years 1–5.

Cumulative Impact on Edenbridge

Although the proposed yield from this site is small, Edenbridge as a whole is accommodating a substantial share of the district's growth, much of it through intensification and back-land development within existing neighbourhoods. The cumulative effects of removing remaining green spaces inside residential blocks, adding new accesses off established streets, and increasing traffic and parking pressures have not been transparently assessed.

Allocating this sensitive, enclosed greenfield site in the early years of the plan without that wider analysis risks contributing to a gradual erosion of character and amenity in central Edenbridge, contrary to the objectives of a plan-led approach.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN3 – Land East of Cedar Drive

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN3 is a small brownfield back-land site of 0.09ha within the urban confines of Edenbridge, currently occupied by residential garages and associated hardstanding. It is bounded by the railway line to the north and by existing gardens and residential properties to the east, south and west, and is proposed to be allocated for 5 residential units as a deliverable site in years 1–5 of the plan period, accessed from Cedar Drive.

We recognise the principle of making efficient use of previously developed land in sustainable locations. However, we consider that the current assessment underplays the effects of losing existing garaging, the constraints arising from the site's tight relationship with neighbouring gardens and the adjacent railway, and the lack of detailed highways, amenity, noise, and contamination evidence to support its classification as “deliverable (years 1–5)” and “unconstrained”.

Positively Prepared

The site's brownfield status and proximity to local services, schools and both Edenbridge stations are positive factors and align with national policy support for small sites within existing settlements.

A positively prepared plan must also address the needs of existing communities. In this case, the evidence does not show that the loss of garages and hardstanding has been weighed against local parking reliance on Cedar Drive, nor that the effects of concentrating new access and parking activity in a back-land location have been assessed in terms of residential amenity, highway safety and quality of life for both existing and future residents next to a busy railway line.

Justified – Evidence Base, Capacity and Site Constraints

The site is small, irregularly shaped, and tightly enclosed by rear gardens and the railway embankment. The SHELAA confirms a developable area equal to the full site area (0.09ha) and a yield of 5 dwellings, but there is no evidence of design-led capacity testing to demonstrate how 5 units, associated parking, turning, private amenity space and the necessary noise buffer

to the railway can be accommodated without overdevelopment or harmful overlooking of neighbouring properties.

The existing use as residential garages and associated land is simply recorded, with no analysis of how many spaces will be lost or where displaced vehicles will park. In a residential street such as Cedar Drive, that is likely to be heavily reliant on off-street or garage parking, this omission is significant and has clear implications for on-street parking stress, obstruction, and general amenity.

The assessment also notes the need for a contaminated land assessment due to former land use, and a noise assessment due to proximity to the railway, but these are left entirely to the application stage. No preliminary work is presented on likely contamination status, remediation scope, vibration issues or realistic façade and layout measures required to secure acceptable internal and external noise levels for future occupiers.

Effective and Deliverable (Years 1–5)

The site is said to be available in years 1–5, with landowner submission and a developer expressing interest, and the Council concludes there are “no constraints that could render the site financially unviable” and that it is deliverable in years 1–5.

Those conclusions are high-level and do not appear to consider possible abnormal costs associated with contamination investigation and remediation, acoustic mitigation (including potential barriers, enhanced construction, and restricted layout options), or the need to design around an irregular back-land footprint while providing adequate parking and turning. For a very small scheme, relatively modest abnormal costs or design complications could materially affect viability and the site’s attractiveness to a developer, yet these factors are not discussed in the evidence.

The SHELAA also relies on generic statements that there is “capacity on the transport network” and that the site “benefits from an existing access off Cedar Drive,” without any detailed highways or swept-path analysis of Cedar Drive’s width, existing on-street parking conditions, manoeuvring space at the garage court, or access for refuse and emergency vehicles once redeveloped. This limits confidence that the site can be delivered quickly and safely in years 1–5.

Consistency with National Policy

National policy on making effective use of land requires that higher densities and brownfield redevelopment do not come at the expense of safe and healthy living conditions, particularly where noise, contamination and constrained access are present. It also expects plans to be underpinned by proportionate, up-to-date evidence on site constraints, viability, and infrastructure.

The treatment of EDEN3 as “unconstrained” does not sit comfortably with the need for contamination and noise assessments, the immediate proximity of the railway, the loss of functioning garages and the tight fit of new housing next to existing gardens. Simply acknowledging these matters and deferring all technical work to the application stage risks

inconsistency with the requirement that allocations themselves be realistically developable and capable of supporting good standards of amenity and highway safety.

Amenity, Access, and Parking

The SHELAA does not address key amenity issues for surrounding residents or for future occupiers, including:

- Overlooking, overshadowing and perceived over-intensification arising from new dwellings in very close proximity to rear garden boundaries on Cedar Drive and neighbouring streets.
- Noise, disturbance and headlight glare from additional vehicle movements, parking and turning within what is currently a relatively low-activity garage court behind existing homes.
- The effect of losing garages and hardstanding on on-street parking pressure, congestion and manoeuvring on Cedar Drive, particularly at times when residents, visitors and service vehicles all seek space.
- The quality of the external environment and private gardens for new homes immediately adjacent to the railway, including noise, vibration, and air quality, and whether acceptable conditions can be achieved without materially constraining layout or reducing capacity.

Without a more detailed assessment of these issues, the assumption that 5 dwellings can be delivered here without unacceptable amenity impacts appears uncertain.

Contamination and Noise Constraints

The need for a contaminated land assessment indicates that historic or current uses may have left pollutants in the ground or structures. For a small, enclosed site with residential gardens nearby, remediation works could be intrusive and costly and may limit the layout or depth of excavation.

Similarly, the requirement for a noise assessment reflects the site's position immediately alongside the railway line. Achieving appropriate internal noise levels, sufficient protection for gardens, and a reasonable sense of tranquillity for new residents may demand a combination of building orientation, non-habitable rooms facing the railway, acoustic glazing and possibly barriers or bunds. None of these potential measures, nor their implications for deliverability, design flexibility or cost, have been explored in the evidence used to support the allocation.

Cumulative Impact on Edenbridge

While 5 units is a modest numerical contribution, Edenbridge is already accommodating a significant share of growth through intensification and small brownfield sites within established neighbourhoods. In that context, the incremental loss of garage courts and off-street parking, combined with additional traffic and activity in back-land locations next to sensitive residential

boundaries, has a cumulative effect on parking stress, general amenity and the “feel” of residential streets such as Cedar Drive.

The evidence for EDEN3 does not demonstrate that these cumulative impacts have been considered alongside other allocations and consents in the town, yet the site is placed in the first five years of the trajectory and treated as an uncomplicated source of housing supply.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN4 – Land North of Springfield Road

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN4 comprises two small back-land parcels (0.15ha in total) behind properties on Springfield Road, currently in use as residential garages and associated hardstanding, with existing access from Springfield Road and open countryside immediately to the north. The Council treats the site as previously developed land within the urban confines of Edenbridge and proposes allocation for 8 residential units, deliverable in years 1–5 of the plan period.

We support in principle the efficient re-use of small brownfield sites, particularly where they are close to services and public transport. However, we have concerns that the evidence base for this allocation does not fully address the loss of existing garaging, the sensitivity of the urban edge adjoining open countryside, and the practicalities of access, amenity, and contamination, and that it therefore falls short of the Regulation 19 Tests of Soundness, especially “justified” and “effective”.

Positively Prepared

The site is within the urban confines of a main town, close to services and within walking distance of two railway stations, which supports its identification as a potentially sustainable location.

A positively prepared plan must also recognise the functional role of the existing garages for local residents, the impact of intensifying back-land activity immediately behind Springfield Road, and the sensitive relationship with the open countryside to the north. There is no evidence that the loss of garages and off-street parking, or the change to the current hard urban edge adjoining countryside, have been weighed against local parking pressures, residential amenity, and townscape considerations.

Justified – Evidence Base, Capacity and Site Constraints

The SHELAA records the site as brownfield land in garage use, but the conclusions text describes it as a “greenfield site” and refers to Grade 3 agricultural land quality. This inconsistency calls into question the robustness and internal coherence of the assessment, and there is no explanation of how agricultural land quality is relevant to an established garage court within the urban area.

The developable area is set equal to the full site area (0.15ha) and a yield of 8 dwellings is assumed, but there is no design-led capacity study showing how 8 units, parking, turning, private gardens and appropriate boundary treatment to the countryside can be achieved within the two tight parcels without overdevelopment or undue overlooking of neighbouring properties. The plans on page 1 show narrow strips of land directly backing onto the open countryside, reinforcing the need for careful layout, landscape buffers, and consideration of visual impact on the settlement edge.

The existing garage use is simply described, with no assessment of how many parking spaces will be lost, how heavily they are relied upon by local residents, or where displaced vehicles are expected to park. In a residential street environment, this omission is significant and goes directly to local amenity and highway safety.

Effective and Deliverable (Years 1–5)

The site has been submitted by the landowner, a developer is reported to be interested, and the Council assumes availability, commencement, and completion all within years 1–5 of the plan period. While this is positive, the timing is based on broad “SDC assumptions” rather than a detailed development programme or evidence of an agreed timetable.

A contaminated land assessment is flagged as necessary due to former land use, yet no preliminary information is presented on the likely extent of contamination, remediation requirements or associated costs and disruption. For a small scheme of 8 dwellings across two constrained parcels, relatively modest abnormal costs or complex remediation could materially affect viability and phasing, but these matters are not explored.

The SHELAA also relies on generic statements that there is capacity on the transport network and that both parcels “benefit from existing access off Springfield Road,” without any local highways or swept-path analysis of: the width and alignment of the garage courts; existing on-street parking conditions on Springfield Road; or safe access for refuse and emergency vehicles once redevelopment has occurred. This undermines confidence that the site can be delivered quickly, safely and at the assumed capacity in years 1–5.

Consistency with National Policy

National policy encourages the effective use of brownfield land but also requires:

- Safe and suitable access for all users, with no unacceptable impact on highway safety.
- High-quality design that responds to local character and the interface with countryside.
- Healthy living conditions, including appropriate management of contamination risks.
- A proportionate, up-to-date evidence base demonstrating that allocated sites are developable and deliverable.

In the case of EDEN4, the conflicting description of the land as both brownfield and greenfield, the absence of a design-led capacity and access assessment, and the limited consideration of contamination and loss of garages suggest that the allocation has not yet been fully tested against these national policy expectations.

Amenity, Access, and Parking

The SHELAA does not assess several material planning issues:

- The impact on existing Springfield Road residents of replacing low-key garage activity with 8 dwellings, including increased traffic, parking, noise and overlooking into rear gardens.
- The effect on on-street parking and manoeuvring on Springfield Road resulting from the loss of garages and any shortfall between new demand and on-site parking provision.
- The suitability of the existing garage court accesses for intensified residential use, including visibility, width, turning space and safe use by refuse and emergency vehicles.
- The quality of outlook and privacy for future occupiers whose gardens will back directly onto open countryside, and the extent of landscape treatment needed to provide an appropriate, defensible boundary to the urban edge.

Without proportionate analysis of these issues, the assumption that 8 dwellings can be accommodated here without unacceptable harm to amenity or local highway conditions remains untested.

Contamination and Relationship with Countryside

A contaminated land assessment is required due to former land use, but the likely nature of contamination, remediation options and their implications for construction, cost and neighbour amenity have not been explored.

At the same time, the plans show both parcels forming the immediate edge between Springfield Road and open countryside to the north. Bringing new housing right up to this boundary will change the character of the settlement edge and may necessitate structural planting, careful boundary treatment and limits on height or massing. None of this is addressed in the SHELAA conclusions, despite the site being described as effectively “unconstrained.”

Cumulative Impact on Edenbridge

EDEN4 is one of several small garage and back-land sites in Edenbridge proposed for redevelopment early in the plan period. Each in isolation may appear modest, but cumulatively they involve the progressive loss of garaging, additional traffic on residential streets and more intensive activity in rear courts next to existing homes and the town’s edges.

The evidence for EDEN4 does not demonstrate that these cumulative impacts on parking, amenity, and the character of Edenbridge’s urban edge have been assessed in the round, yet the site is treated as a straightforward, early source of housing supply.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN5 – Edenbridge War Memorial Hospital,

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN5 comprises 1.06ha of partly brownfield land occupied by the former Edenbridge & District War Memorial Hospital/medical centre buildings, associated car parking, grassed areas and the Edenbridge war memorial itself. The buildings are now largely obsolete and in poor, decaying condition, with medical services having moved to the new medical centre elsewhere in Edenbridge, but the war memorial remains in active, symbolic community use. The site lies mostly within the urban confines but partly within the Green Belt, bounded by Mill Hill to the east, existing housing to the north, Blossoms Park to the south and open countryside to the west. It is proposed for mixed-use redevelopment including 34 residential units and 10% community use (Class C1/E), with delivery assumed in years 1–5 of the plan period.

We support in principle the objective of bringing a redundant and deteriorating site back into productive use at a central location close to services and public open space. However, the current assessment does not adequately address Green Belt policy, heritage, and townscape impacts (including the future of the war memorial and its setting), contamination and noise constraints, the realism of the assumed delivery timescale, or the way density has been derived from the gross site area. In our view this raises concerns under the Regulation 19 Tests of Soundness, particularly “justified”, “effective” and “consistent with national policy”.

Positively Prepared

It is reasonable for the Plan to consider the redevelopment of an outdated institutional site within the built-up area, especially where it adjoins housing and a major recreation ground. The partial brownfield status and central position on Mill Hill support, in broad terms, the idea of mixed-use re-use.

A positively prepared plan must also recognise that this is not simply a redundant medical site: it is the location of the Edenbridge war memorial and has long-standing civic and commemorative significance. The allocation does not explain how the memorial and its setting will be protected, whether it is intended to remain in situ, or how new development will maintain or enhance its visibility, accessibility, and dignity. Similarly, the proposed “10% community floorspace” is not justified by evidence showing that it will reflect local expectations for ongoing community and commemorative use of this important site now that the original medical function has relocated.

Justified – Evidence Base, Capacity, Density and Site Constraints

1. Green Belt and settlement edge

Approximately 30% of the site area lies within the Green Belt, and the western element is identified in the evidence base as not recommended for release in the Stage 2 Green Belt Assessment. The SHELAA nevertheless describes the site as having an “unconstrained nature” and being suitable for development, without clearly distinguishing between the urban and Green Belt portions or showing how built development will be contained within existing urban boundaries. This lack of clarity on the Green Belt component undermines the justification for the allocation.

2. Heritage, townscape, and the war memorial

The site lies within the Edenbridge Conservation Area and within 200m of several listed buildings. The existing buildings, lawns, access from Mill Hill and the war memorial together create a distinct civic and commemorative character in this part of the Conservation Area. Although these designations are listed in the constraints table, there is no proportionate heritage or townscape appraisal that addresses:

- The contribution of the war memorial and its setting to the significance of the Conservation Area.
- How a 34-dwelling, mixed-use scheme can preserve or enhance that character and protect the prominence and dignity of the memorial.

The conclusion that there are “no other constraints which would make the land unsuitable” is therefore not supported by site-specific heritage analysis.

3. Scale, mix, and density derived from the gross site area

The SHELAA records a site area and “developable area” of 1.06ha, with a yield of 34 dwellings and 10% of the site set aside for community use. On the face of it, this implies a moderate gross density of roughly 32 dwellings per hectare, which appears reasonable. However, this headline figure is derived from the whole site area, including the Green Belt strip and land required for community use, the war memorial, circulation, landscaping, and open space. In practice, the residential element will occupy only part of the 1.06ha, meaning the true density on the housing land will be materially higher than 32 dph. This is not transparently acknowledged or tested. There is no design-led capacity study showing how the proposed residential quantum, community floorspace, war memorial, parking, circulation, open space and landscape buffers to Blossoms Park and the countryside can be accommodated without overdevelopment or undue harm to townscape, amenity, and the memorial’s setting.

4. Contamination and noise

The need for a contaminated land assessment and a commercial noise assessment is recognised. For a site with long-standing institutional and car park uses, contamination and noise could materially influence layout, remediation costs, and the positioning of more sensitive residential uses. The SHELAA treats these as routine application-stage matters and provides no preliminary analysis of likely contamination, remediation scope, noise sources, or mitigation measures. This weakens the evidence that the assumed quantum and mix can be delivered effectively.

Effective and Deliverable (Years 1–5)

1. Timing and availability inconsistencies

Landowner information indicates site availability around 2025, with anticipated commencement in the 2026–2030 period and no firm completion date, pointing towards delivery in the middle of the plan period rather than in years 1–5. The Council nevertheless classifies the site as “Deliverable (Years 1–5)” and includes it in the early housing supply. This mismatch between promoter expectations and the Plan’s trajectory is not explained and undermines confidence in the five-year housing land supply.

2. Viability and abnormal costs

The assessment asserts that there are “no constraints that could render the site financially unviable,” but this is a broad judgement that does not explicitly consider potential abnormal costs associated with:

- Demolition of extensive institutional buildings.
 - Contamination investigation and remediation.
 - Noise mitigation.
 - Heritage-sensitive design within a Conservation Area.
 - Green Belt edge treatment and landscaping.
 - Retention and enhancement of the war memorial and its setting.
- For a mixed-use scheme of this complexity, such factors could significantly affect viability, phasing, and the achievable balance between residential and community uses.

3. Access and network capacity

The site is said to benefit from an existing access off Mill Hill and to have “capacity on the transport network (contributions towards improvements may still be sought).” These are generic statements. No local highways assessment is presented to examine trip generation from 34 dwellings plus community uses, parking demand, junction performance on Mill Hill, or safe arrangements for pedestrians, visitors to the memorial, and emergency vehicles within a redeveloped layout. Without this, the classification of the site as straightforwardly deliverable in years 1–5 is not robustly supported.

Consistency with National Policy

National policy requires:

- Strong protection of the Green Belt, with any changes justified by clear exceptional circumstances and robust boundaries.
- Preservation or enhancement of Conservation Areas and the setting of heritage assets, including war memorials that contribute to local significance.
- Redevelopment of previously developed land to be supported by proportionate, up-to-date evidence on constraints, viability, contamination, noise, and infrastructure.

- Housing trajectories and five-year supply calculations to be based on realistic assumptions about timing of delivery.

By describing a partly Green Belt, Conservation Area site containing a war memorial as effectively “unconstrained,” relying on high-level assertions on contamination, noise, and viability, deriving a modest headline density from the gross site area, and including the site in the years 1–5 supply despite later landowner timescales, the allocation risks inconsistency with these national policy requirements.

Amenity, Access, and Community Use

The supporting evidence does not examine in detail:

- The impact on neighbouring homes of replacing the current, relatively low-rise hospital buildings and open lawns with a denser residential and mixed-use scheme, including changes in overlooking, noise, lighting, and patterns of activity.
- The parking and traffic implications of 34 homes and community uses using the Mill Hill access, particularly at peak times and alongside existing movements.
- How the war memorial will be safeguarded during demolition and construction and how its long-term setting, accessibility, and ceremonial use (for remembrance events and quiet reflection) will be maintained in a denser development.
- Whether the proposed 10% community floorspace is sufficient in scale, type, and location to reflect the longstanding civic and commemorative importance of this site and to meet local expectations for future community use.

These issues are central to understanding how the redevelopment will affect the day-to-day experience of Edenbridge residents and the role of the site in the life of the town.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN5

We have reviewed the Regulation 18 Development Brief for EDEN5, Edenbridge War Memorial Hospital. The site is no longer a functioning health facility: clinical services have transferred to the new Edenbridge Memorial Health Centre, and the former hospital building is now a redundant, deteriorating non-designated heritage asset within situ war memorials on the same site.

Our comments below are framed against the Regulation 19 tests of soundness, the NPPF and the emerging Sevenoaks Local Plan.

1. Positively Prepared

The brief identifies EDEN5 as a 1.06 ha mixed-use site (residential + community), with a promoted capacity of 34 dwellings at a stated net density range of 40–60 dph. However, it does not set out a clear, positively prepared strategy for this redundant community site:

- The brief lists affordable housing and housing for older people as “policy priorities” but does not explain how this particular town-edge site will respond to local needs in Edenbridge in terms of unit mix, tenure, accessibility, or specialist older persons’ provision.
- The proposed use is “Mixed Use – Residential + Community,” but **the community component is completely unquantified**: there is no indication of minimum floorspace, potential uses, or how the scheme will secure a long-term community role on this war memorial site now that health uses have moved elsewhere.
- The promoted capacity of 34 dwellings sits noticeably below the stated density range for the total 1.06 ha site, yet the brief offers no explanation of how this interacts with retained buildings, parking, open space, trees, and community floorspace.

As it stands, the brief does not demonstrate a clear, locally responsive strategy for making best use of this redundant community/heritage site, which weakens the “positively prepared” case.

2. Justified

For the “justified” test, the evidence and reasoning behind the approach to this site need to be transparent. At present they are not.

- There is no capacity or options testing to show that 34 dwellings plus meaningful community floorspace, heritage retention, adequate parking, access, and amenity can be achieved at 40–60 dph whilst retaining key features (white gabled building, mature boundary vegetation, transition between town and country).
- There is no explanation of reasonable alternatives: for example, a more community-focused scheme with fewer dwellings; a heritage-led refurbishment with limited enabling development; or a stronger emphasis on civic, cultural or wellbeing uses that reflect the war memorial function now that clinical services are elsewhere.
- The brief says reuse of the existing building “must be the first approach” and that “robust justification is required” for demolition, but does not present any structural, condition, viability, or refurbishment evidence to show whether reuse is realistically achievable, especially given local experience of the building steadily decaying.

Without explicit evidence or a summary of the Council’s assessment, the brief is vulnerable to challenge as being based on untested assumptions rather than clear justification.

3. Effective

The brief provides limited assurance that the allocation will be deliverable and enforceable over the plan period.

- The 6–10 year delivery timeframe is stated as the promoter’s estimate, with no supporting explanation of dependencies (funding, partnership with community bodies, extent of refurbishment versus redevelopment, etc.).
- Infrastructure requirements are expressed only at “wider settlement” level, with an explicit statement that “specific site contributions will be confirmed” at Regulation 19. For a small but highly sensitive community site, the complete absence of any site-specific contribution expectations (for example, towards town-centre public realm, walking links, or community space fit-out) undermines the ability to show effective delivery.
- Key wording is vague and non-committal: “site may be suitable for older persons accommodation,” “robust justification is required” for demolition, with no criteria or thresholds for decision-making.

This language leaves too much room for later dilution of commitments at application and appeal stage. The brief needs firmer, more specific requirements if it is to function as an effective tool.

4. Consistency with National Policy

There are several areas where consistency with the NPPF and national guidance is weak or unclear.

- The brief recognises the existing building as a non-designated heritage asset and notes its popularity but does not require a Heritage Impact Assessment or set out how the

decision-making process will weigh harm and benefits in accordance with national policy on non-designated heritage assets and conservation area settings.

- It is silent on the long-term memorial and community role of the site, even though the building and grounds have an obvious commemorative function. There is no reference to how this will be conserved, enhanced, or interpreted in the new scheme.
- The brief does not explicitly embed requirements for biodiversity net gain, SuDS, carbon reduction, or climate resilience, despite the generic definitions of SuDS and the wider Local Plan emphasis on sustainable design and infrastructure.

Without stronger, clear references to NPPF themes – heritage, community facilities, design quality, climate, and environment – the brief risks being treated as a light-touch design note rather than a robust development brief.

5. Policy Soundness Beyond Regulation 19

The brief must sit clearly within the Local Plan’s strategic framework if it is to be defensible at examination.

- The generic sections emphasise that development briefs are to be read alongside the Local Plan and will be adopted as part of it. However, the EDEN5 pages do not spell out how this specific allocation delivers relevant strategic objectives for sustainable communities, design, heritage, and infrastructure in Edenbridge.
- The brief does not make clear links to the Plan’s community and infrastructure policies that govern the reuse and loss of community facilities and the approach to redundant sites. Instead, it relies on a single “Mixed Use – Residential + Community” label with no policy analysis behind it.

This lack of explicit policy linkage and strategic narrative leaves the brief exposed to challenge at Regulation 19 and examination.

6. Site-Specific Robustness

For a long-established, now-redundant hospital site, the brief omits basic technical and contextual matters that would normally be expected.

Missing or weak elements include:

- **Ground conditions and contamination** – there is no requirement for a contamination assessment or remediation strategy, despite the former medical use and associated risk of legacy contamination.
- **Flood risk and drainage** – the site-specific section does not mention flood risk, surface water management, or SuDS, even though the generic glossary defines SuDS and their purpose.
- **Highways and access** – there is no guidance on vehicular access from Mill Hill, parking expectations, or how to manage safe movement for pedestrians and cyclists in conjunction with residential and community use.

- **Utilities and capacity** – the brief simply defers to settlement-wide references to increased sewerage and clean water capacity, with no site-specific acknowledgement of constraints or upgrade requirements.
- **Heritage and trees** – while it rightly notes that the building is a non-designated heritage asset and that boundary vegetation contributes to the character and conservation area, it does not require a heritage impact assessment, tree survey, or Arboricultural method statement.

These omissions undermine the robustness of the brief as a development management tool.

7. Impacts on Edenbridge and Local Communities

Even though EDEN5 is modest in housing numbers, its community and heritage role makes it strategically important for Edenbridge.

- Clinical health needs are now met from the new Edenbridge Memorial Health Centre, and the Local Plan evidence base notes that capacity there is under review. The brief does not explain how the former hospital site is to be repositioned in this context – for example, as a complementary community, voluntary, wellbeing, cultural or memorial hub.
- There is no assessment or commentary on local traffic and parking impacts around Mill Hill and the town centre, despite the potential for conflict between residential parking, community use, visitors to the memorial and through-traffic.
- **Cumulative impacts with other Edenbridge allocations are not considered**, even though the Infrastructure text acknowledges that education, rail, sewerage, and water capacity will need to be increased in step with growth.

Without a clear community-benefit narrative and basic assessment of local impacts, the brief risks being perceived as primarily a residential intensification of a redundant community site.

8. Sustainability and Environment

The brief does not convert broad sustainability aspirations into enforceable, site-specific requirements.

- There is no express requirement to deliver biodiversity net gain on-site or through off-site measures, nor any indication of how existing trees and green infrastructure (which the brief acknowledges as positive contributors to character and screening) will be protected and enhanced as part of a coherent landscape strategy.
- SuDS are explained generically but are not required for this site in terms of design principles, discharge hierarchy, or constraints.
- Energy efficiency, low-carbon design, and climate resilience standards are not addressed at all at the EDEN5 level.

This leaves a gap between the Local Plan's overall climate and environmental ambitions and what is actually required of applicants on this sensitive site.

9. Deliverability, Viability and Developer Contributions

Given the age and condition of the building, deliverability is likely to be closely tied to viability and the balance between refurbishment, enabling development and community obligations.

The brief is currently silent on:

- How the community component (floorspace, fit-out, long-term management) is expected to be funded and secured through planning obligations or other mechanisms.
- The minimum specification for community use, there is no commitment that this will be “meaningful” in scale or type, leaving open the prospect of very limited or token provision that would nonetheless claim to satisfy the “mixed use” label.
- How the Council expects to weigh viability arguments where refurbishment of the decaying building is expensive; there is no requirement for an options appraisal showing that less harmful alternatives have been properly explored before demolition is considered, as national policy would imply for a valued non-designated asset.

Without clearer expectations, there is a real risk that viability arguments are used later to justify loss of heritage and minimal community benefit.

10. Legal and Procedural Vulnerabilities

The following aspects create particular risks for future decision-making and potential challenge:

- The phrase “robust justification is required if the proposal involves the demolition of the existing building” is not supported by clear procedural or evidential requirements (for example, a heritage impact assessment, structural survey, options appraisal, viability analysis). This vagueness invites dispute about what “robust” means.
- The absence of defined community floorspace or specified community uses means that very small or low-value facilities might be advanced at application stage; it would be difficult for the Council to resist such proposals if the brief is not strengthened.
- Infrastructure expectations are deferred to Regulation 19 and expressed only at settlement level; there is no clear audit trail showing how EDEN5 contributes to cumulative infrastructure needs in Edenbridge.

These weaknesses reduce clarity, increase the scope for inconsistent decisions, and weaken the Council’s position at appeal.

11. Recommended Changes and Suggested Wording

To make the brief more sound, robust and enforceable, we request that the Council amends the EDEN5 brief along the following lines.

11.1 Clear Vision for a Redundant Community/Memorial Site

Insert an explicit SDC Vision paragraph for EDEN5, for example:

“Development at Edenbridge War Memorial Hospital will deliver a heritage-led mixed-use scheme on this now-redundant hospital site. Proposals will retain and enhance the significance of the existing non-designated heritage asset and its role as a war memorial, provide modern community floorspace to meet identified local needs, and deliver a modest number of new homes including affordable and older persons’ accommodation. The scheme will preserve the positive transition between town and country on Mill Hill, maintain and enhance the vegetated frontage and key views of the white gabled building, and provide safe, attractive walking and cycling links to Edenbridge town centre and local services.”

11.2 Secure a Meaningful Community Role

Under “Proposed Use” and “Policy Priorities,” require the following:

- A minimum quantum of on-site community floorspace (to be defined at Regulation 19) with uses that respond to locally-evidenced needs (for example, community, civic, voluntary, wellbeing or cultural uses) rather than further clinical services already provided at the new health centre.
- A commitment that redevelopment must safeguard and enhance the war memorial function through dedicated internal and/or external space, interpretation, and public access arrangements.

11.3 Strengthen Heritage and Design Requirements

Expand the “Heritage” section as follows:

- Require a Heritage Impact Assessment, including detailed assessment of the building’s significance as a non-designated heritage asset and of the site’s contribution to the conservation area and townscape.
- Require that any proposal involving partial or total demolition is supported by:
 - an independent structural condition survey
 - a heritage-led options appraisal evidencing serious consideration of retention and reuse
 - a viability assessment where demolition is claimed to be necessary to secure public benefits.

The brief should state that demolition will only be supported where the public benefits of the proposal clearly and convincingly outweigh the harm to the non-designated heritage asset and local character.

11.4 Add Core Technical Requirements

Include explicit requirements that:

- A land contamination assessment and, where necessary, remediation strategy is submitted, proportionate to the site’s former hospital use.
- A site-specific flood risk and drainage strategy is prepared, demonstrating the use of SuDS and compliance with the drainage hierarchy, with no increase in flood risk on or off site.

- A tree survey and Arboricultural impact/method statement accompany proposals, with a strong presumption in favour of retaining and enhancing the Mill Hill boundary vegetation identified in the brief.

11.5 Clarify Housing Mix and Older Persons' Provision

Under "Housing Types and Mix," require:

- A mix that responds to the Targeted Review of Local Housing Needs and local evidence for Edenbridge, with a particular focus on smaller, accessible homes and provision for older people where compatible with the heritage and community roles of the site.

11.6 Infrastructure and Contributions

Within the infrastructure section, add:

- A requirement for applications to demonstrate how EDEN5 will contribute proportionately to education, walking and cycling, water/wastewater and town-centre improvements identified for Edenbridge, referencing the latest Infrastructure Delivery Plan Statement.
- A clear expectation that Section 106 obligations will secure delivery and long-term management of community floorspace and public memorial space on the site.

12. Key Points for the Council

On this basis:

- The EDEN5 brief is not yet "justified" or "effective" because it does not present a clear, evidenced framework for re-using this redundant hospital and memorial site in a way that balances heritage, community benefit, and residential development.
- The failure to specify community floorspace, community uses or memorial arrangements risks the site being developed primarily for housing, contrary to the stated mixed-use description and the site's historic community role.
- The absence of basic technical and environmental requirements (contamination, SuDS, drainage, trees, heritage assessment) undermines robustness and exposes future decisions to challenge.

We ask the Council to strengthen the EDEN5 Development Brief as set out above and to carry a more robust, detailed version forward to Regulation 19 so that this important site is treated as a genuine community and heritage asset, not simply as a housing opportunity.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN6 – 78–80–82–84 High Street and 1–2 Leathermarket

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN6 is a 0.29ha brownfield site within Edenbridge town centre, comprising a group of retail units (some vacant), a public car park and a pedestrian walkway between Waitrose and the High Street. It is bounded by the High Street to the east and by retail and employment uses on other sides and lies wholly within the urban confines and the designated Town and Local Centre. The Council proposes a mixed-use allocation of 14 residential units at 50 dph, 30% retained retail and a public car park, treating the site as “deliverable (years 1–5)”.

We recognise the benefits of regenerating a central brownfield site that includes vacant commercial premises and could strengthen the High Street. However, the assessment appears to underplay significant constraints related to flood risk, heritage, town-centre parking, and legal/availability issues, and in our view does not yet fully satisfy the Regulation 19 Tests of Soundness, particularly in relation to being “justified”, “effective” and “consistent with national policy”.

Positively Prepared

The reuse and intensification of a town-centre brownfield site within the urban confines of a main settlement is in principle consistent with national policy, especially where it can support the vitality and viability of the High Street and make efficient use of land in a sustainable location. The description of the site as within easy reach of town-centre services and public transport, including Edenbridge Town station, reflects this policy direction.

A positively prepared plan must also consider the needs of existing town-centre users and businesses, including the role of the public car park, the continuity of retail frontages, and the implications of concentrating new residential units in a flood-affected location that includes a listed building and sits partly within the conservation area. There is no clear explanation of how the mix of housing, retail and retained parking has been tested against town-centre capacity, trading patterns, and parking demand, or how the plan will avoid simply displacing existing activity and investment.

Justified – Evidence Base, Capacity and Key Constraints

The SHELAA treats the whole 0.29ha as developable and calculates 14 dwellings at 50 dph, with 30% of floorspace retained as retail and the car park re-provided. There is no design-led capacity work to demonstrate how this mix will be arranged across the site while accommodating safe circulation, servicing, refuse and disabled access, or how the residential elements will sit above or alongside retail in a way that respects the existing townscape and listed building.

Flood risk is a central constraint. The assessment records that the site lies fully within Flood Zone 2 and partly within Flood Zone 3 and explicitly notes that further consideration will be needed following the updated Strategic Flood Risk Assessment before Regulation 19. Despite this, the conclusions still describe the site as effectively “unconstrained” and suitable for development. There is no evidence of a site-specific sequential and exception test, no indication of finished floor levels, safe access/egress routes, or flood-compatible uses at ground level, and no assessment of residual risk under climate change allowances.

Heritage is also significant. Around 44% of the site lies within the Edenbridge Conservation Area and it contains the listed Tanyard House. The conclusions do not include any proportionate heritage appraisal or townscape analysis explaining how new residential and commercial development will preserve or enhance the character and appearance of the conservation area and the setting of the listed building, or what implications this may have for height, massing, and layout. Simply noting heritage designations in a table and then concluding that there are “no other constraints which would make the site unsuitable” is not a robust justification.

Effective and Deliverable (Years 1–5)

The site promoter indicates that the land will be available by 2025, but that commencement is anticipated in 2026–2030, and the availability section of the SHELAA therefore places the site in years 6–10. However, the overall conclusion reclassifies the site as “Deliverable (Years 1–5)”, without explaining how this earlier trajectory has been derived or how it aligns with the promoter’s own timescales.

A 75-year lease is identified as a legal constraint requiring “further exploration”, with an indication that inclusion in the Local Plan might encourage progress. This suggests that land assembly is not yet secure and that delivery is conditional on future negotiations, which is not reflected in the confident “deliverable” conclusion. There is also no detailed assessment of viability, despite the complexity of combining new-build residential, retained and replacement retail, car parking, flood mitigation, and heritage-sensitive design within a constrained urban block.

The assertion that there are “no constraints that could render the site financially unviable at this time” appears to be a high-level judgement that does not account for potential abnormal costs associated with flood-resilient construction, potential loss of trading space during redevelopment, heritage requirements for Tanyard House, or structural solutions to maintain or replace the public car park. For a town-centre mixed-use scheme, such costs could materially affect phasing and attractiveness to developers.

Consistency with National Policy

National policy supports town-centre regeneration and the efficient use of brownfield land, but it also requires:

- A sequential, risk-based approach to flood risk, steering more vulnerable uses such as housing to areas of lowest risk and requiring robust justification and mitigation where development is proposed in Flood Zones 2 and 3.
- Conservation and enhancement of heritage assets and their settings, with decisions informed by proportionate heritage assessments.
- Five-year housing land supply and trajectories to be based on realistic assumptions about availability, suitability, and achievability, including where there are legal agreements and complex mixed-use proposals.

In relation to EDEN6, the Plan relies on generic statements about flood risk and network capacity, and on a broad assertion of “unconstrained nature”, rather than a transparent sequential/exception test, a heritage-led design assessment, or a clear reconciliation of legal and programming issues. This raises questions about consistency with national policy on flood risk, heritage, and deliverability.

Amenity, Access, Parking and Town-Centre Function

The SHELAA does not address in detail how the redevelopment will affect:

- The availability and management of public car parking during and after construction, given the importance of the existing car park to both Waitrose and the wider High Street.
- Servicing, delivery, and refuse arrangements for both the retail units and the proposed housing, including noise and disturbance to future residents and adjacent businesses.
- The quality of living conditions for new residents in a dense town-centre environment, including noise, odour and activity associated with retail, food and drink uses, and the particular issues posed by a flood-affected location.

Without a more specific assessment of these matters, it is difficult to be confident that the assumed mix and quantum of development can be delivered while maintaining the vitality and function of Edenbridge High Street and providing a good standard of amenity.

Cumulative Impact on Edenbridge

This site is part of a wider pattern of intensification and mixed-use redevelopment in central Edenbridge. The cumulative effects on town-centre parking, servicing arrangements, flood risk management, heritage character, and residential amenity have not been clearly set out. Treating EDEN6 as a straightforward, early-years allocation risks underestimating how these overlapping pressures may interact across the High Street and surrounding streets.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN6

1. Regulation 19 Tests of Soundness

1.1 Positively Prepared

EDEN6 is a **small but very constrained** town-centre site:

- Within the Edenbridge Conservation Area and in the setting of multiple listed buildings.
- Entirely in Flood Zone 2 and partly Flood Zone 3, with a watercourse running beneath the site leading to the historic stream between 86–92 High Street.
- Tight back-land car park and access arrangements behind the High Street.

Despite that, the brief:

- Describes a “landmark” three-storey frontage and allows built form to “step up in height to 4-storeys towards the north-western corner of the site”.
- Talks about “optimising” development following parking surveys and construction investigations.
- Presents the scheme as a “cornerstone of the town centre strategy” expected to catalyse wider regeneration.

None of this is explicitly framed as a **maximum compatible with the constraints**. Instead, the language leaves room for later arguments that more massing or intensity is “in the spirit” of the brief.

Soundness point: the brief is not positively prepared because it does not clearly translate flood, heritage, and access constraints into firm upper limits on scale and height, even though this is a flood-affected site in a conservation area.

Suggested wording to seek

“The quantum of development and building heights identified for EDEN6 represent an upper limit having regard to flood risk, heritage, townscape, access, and amenity constraints. Proposals that seek to exceed these limits will not be supported.”

1.2 Justified

The brief acknowledges constraints but **does not back the promoted form with proportionate evidence.**

- **Flood risk:** It notes the Flood Zone 2/3 status and says flood risk should be “integral” and ground-floor uses “compatible with the flood risk”, but there is no reference to the Strategic Flood Risk Assessment, no clear application of the sequential and exception tests, and no requirements for safe dry access/egress, finished floor levels, residual-risk management or climate-change allowances.
- **Heritage:** It states development will “respect and clearly enhance” the conservation area and listed-building setting and that important views and groupings will be retained, but there is no heritage-led height/massing envelope or view analysis to explain why a landmark frontage and possible four-storey element would be acceptable in this context.
- **Infrastructure:** “Wider settlement infrastructure requirements (as per emerging IDP)” are listed (primary, secondary, health, walking/cycling, PROW, stations, sewerage, clean water), but the generic text admits that:
 - requirements are **for the wider settlement only** at this stage,
 - site-specific contributions “will be confirmed” at Regulation 19, and
 - infrastructure planning is an ongoing process with gaps and uncertainties.

For Edenbridge, that means there is currently **no clear, costed, town-specific infrastructure package** linked to EDEN6, only a generic list plus a promise to deal with contributions later.

Soundness point: the brief is not justified because the scale and form of development are asserted rather than evidenced against flood-risk, heritage, and infrastructure constraints, and because the “emerging IDP” does not yet provide a robust Edenbridge-specific basis for infrastructure assumptions.

Suggested wording

“Applications must be informed by a site-specific Flood Risk Assessment demonstrating application of the sequential and exception tests, safe dry access and egress, appropriate finished floor levels, residual-risk management and climate-change allowances, in accordance with Policy W1 and national guidance.”

“A heritage and townscape assessment must define a height and massing envelope, including verified views, that preserves or enhances the Edenbridge Conservation Area and the setting of nearby listed buildings. Development above three storeys will not be permitted unless this assessment demonstrates that additional height will cause no harm.”

“Prior to Regulation 19, the Council will publish updated Infrastructure Delivery Plan schedules for Edenbridge, setting out specific projects, costs, and responsibilities. The EDEN6 brief will then be updated to specify the contributions expected from this site.”

1.3 Effective

Effectiveness is about whether the brief will actually work at application and appeal stage.

- The 6–10 year delivery timeframe is simply “defined by the site promoter”; there is no delivery/ phasing plan, no indication of when public space, the east–west route or any community/market space will materialise.
- Infrastructure obligations are explicitly **deferral-based**: settlement-wide now, site-specific later at Regulation 19, with the caveat that absence of a requirement “does not imply that none will be necessary”.
- Aspirational language in the SDC Vision (“cornerstone,” “optimised for long-term success,” “lively, inclusive, sociable environment”) is not translated into measurable standards or limits.

Soundness point: the brief is not effective because too much is left to future stages (infrastructure, delivery, some design parameters), and because key terms are aspirational rather than enforceable. That makes it harder for the Council to resist over-ambitious schemes or insist on full mitigation.

Suggested wording

“Planning applications must be accompanied by a delivery and phasing plan showing when the built development, public realm, east–west route and any public/market space will be provided within the 6–10 year period.”

“Once the Regulation 19 infrastructure schedules for Edenbridge are in place, planning applications for EDEN6 must demonstrate compliance with the identified site-specific obligations.”

1.4 Consistent with National Policy

- For a more vulnerable use in Flood Zones 2 and 3, national policy requires rigorous sequential and exception testing and clear design criteria for safe access, residual risk, and resilience. The brief does not provide this level of clarity.
- For heritage, national policy gives great weight to conservation. The brief proposes a landmark frontage and possible four-storey element in a fine-grained High Street context without a heritage-led envelope or view testing.

Soundness point: the brief is vulnerable to argument that it does not fully embed national flood-risk and heritage policy at plan-making stage.

2. Policy Soundness Beyond Regulation 19

The brief lists relevant policies (TLC1, EDN1, H2, T2, W1, HEN1) and repeats general aims about design quality and town-centre vitality.

However:

- It does not clearly **tie EDEN6 to specific Edenbridge Town Centre objectives** (e.g. particular public-realm projects, specific active-travel links, or station-access improvements), just loosely to the “Town Centre Strategy” and generic cafés / restaurants / community events.
- The wider development-brief framework refers to character studies, Edenbridge Character Area Assessment, and landscape-led design, but there is **no explicit requirement** that EDEN6’s height, bulk and roofscape are directly derived from that evidence.

Risk: at examination or appeal, a bulky proposal could be argued to fit the “vision” because the brief doesn’t pin it firmly to the character evidence or to specific Edenbridge town-centre projects.

Suggested wording

“Proposals must demonstrate how the scheme delivers specific elements of the Edenbridge Town Centre Strategy, including high-quality public realm, pedestrian and cycle connections consistent with the LCWIP, and space capable of accommodating community and market activity.”

“The form, height and roofscape of development must be explicitly informed by the Edenbridge Character Area Assessment and conserve the fine grain, rhythm and vernacular materials of the High Street.”

3. Site-Specific Robustness

Key missing / weak requirements

- No explicit SuDS strategy or design-led flood-risk parameters, despite the culverted watercourse and FZ2/3 designation.
- No quantified parking or servicing principles (e.g. protection of short-stay shopper parking, servicing hours, vehicle routing) even though “early investigations and parking surveys” are required.
- No utilities statement requirement, even though the wider text acknowledges the need to increase sewerage and clean-water capacity alongside development.
- No requirement for ground investigation/contamination work, despite 1960s construction and the presence of a culvert.
- No daylight/sunlight, overshadowing or overlooking analysis requirement, notwithstanding multi-storey apartments overactive uses in a tight urban grain.

Suggested wording

“Applications must include: a site-specific FRA and drainage strategy; a Transport Statement including parking surveys, trip generation and servicing strategy; a utilities statement; ground-investigation and contamination assessments; and daylight/sunlight and privacy analyses.”

4. Impacts on Edenbridge and Local Communities

- **Parking and servicing:** loss or reconfiguration of the rear car park plus new homes and evening-economy uses will affect parking stress and deliveries in the High Street. The brief’s “parking surveys” requirement is not backed by any outcome (e.g. no net harm to shopper parking, managed servicing).
- **Movement:** the east–west route from the supermarket to the High Street is positive in concept, but the brief does not guarantee that it will be step-free, safe, overlooked and kept free from servicing conflicts, even though it is described as a key route to attract visitors.
- **Cumulative infrastructure:** the settlement-wide list of needs for Edenbridge is high-level and emerging, and the brief confirms that infrastructure requirements will be confirmed later at Regulation 19. There is no assurance that EDEN6’s cumulative impact on schools, health, utilities, and movement will be fully mitigated, or that its scale will be kept within what the town’s infrastructure can support.

Suggested wording

“Development must demonstrate there is no net harm to the availability and function of short-stay shopper parking serving Edenbridge High Street, and that servicing arrangements will not worsen congestion or pedestrian safety.”

“The east–west link between the supermarket and High Street must be a safe, step-free, overlooked pedestrian and cycle route, designed in accordance with the LCWIP (which of time of writing does not exist for Edenbridge) and kept clear of regular servicing traffic.”

5. Sustainability & Environment

- BNG is not explicitly required, despite the opportunity to use the public-realm space, retained tree and blue-green infrastructure to secure measurable gain.
- SuDS are defined in the generic section but not mandated for EDEN6.
- There are no explicit requirements for energy efficiency, low-carbon design, overheating mitigation or embodied-carbon consideration, despite the Council’s broader emphasis on design quality.

Suggested wording

“Development must secure at least the statutory minimum Biodiversity Net Gain, prioritising on-site measures such as tree planting, biodiverse roofs and rain gardens integrated into the public realm.”

“Sustainable Drainage Systems (e.g. permeable paving, rain gardens and green roofs) must be incorporated into the layout and public realm to manage surface water, reduce flood risk and enhance amenity and biodiversity.”

“Proposals must demonstrate high standards of energy efficiency and climate resilience, address operational and embodied carbon and mitigate overheating.”

6. Deliverability and Practicality

- High expectations (policy-compliant affordable housing, design excellence, quality public realm, flood-resilient construction, heritage-sensitive materials) are loaded onto a small, complex site, but viability is not addressed at all.
- Given that infrastructure requirements are emerging, and site-specific obligations are deferred, there is a real risk that viability arguments later become a **driver for more height or bulk** or for dilution of quality.

Suggested wording

“Any departure from policy-compliant affordable housing or identified infrastructure contributions must be justified through transparent viability evidence. Viability will not be accepted as justification for increasing height, bulk or quantum beyond the parameters set out in this brief where this would harm heritage, townscape, flood-risk management, amenity, or highways safety.”

7. Legal and Procedural Vulnerabilities

The combination of:

- vague, aspirational phrases (“landmark building,” “cornerstone of the town centre strategy,” “optimised,” “could step up in height to 4-storeys”),
- incomplete flood-risk and heritage criteria on a FZ2/3 conservation-area site,
- and an emerging, non-specific infrastructure framework for Edenbridge,

creates scope for future legal and appeal arguments about what the brief really permits.

Final Thoughts

We support **sensitive** regeneration of the Leathermarket site but consider the EDEN6 development brief unsound unless modified: it relies on vague, aspirational wording and an emerging infrastructure position, without clear evidence-based caps or safeguards for flood risk, heritage, parking, amenity, and environmental performance, and therefore is not fully justified, effective or consistent with national policy.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN7 – Gabriels Farm House, Mill Hill

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN7 is a 0.26ha, partially brownfield site at Gabriels Farm House on Mill Hill. It comprises an existing dwelling, its garden and associated hardstanding on the southern edge of Edenbridge, bounded by Blossoms Park and the cricket ground to the north, Mill Hill to the east, and open countryside to the south and west. The site lies wholly within the Green Belt and is classified by the Council as “grey belt” in its Stage 3 Green Belt work. The SHELAA proposes allocation for 10 residential units as a new-build scheme, with the existing dwelling to be re-provided, and treats the site as “suitable”, “deliverable” and an early (years 1–5) allocation.

We recognise that the site is close to the built-up area and to local services compared with more remote rural locations, and that there is an extant permission for one additional dwelling. However, we are concerned that the evidence does not robustly address Green Belt policy (including the new national “grey belt” framework), landscape and settlement-edge impacts, flood risk, or the realism of early delivery assumptions. In our view, the classification of the site as effectively “unconstrained” grey belt is not adequately justified against the Regulation 19 Tests of Soundness.

Positively Prepared

The Plan’s objective of focusing some growth on land adjoining a main town is understood, and the SHELAA records that the site is adjacent to the urban confines, within 400m of Edenbridge and within 800m of the central and southern town-centre areas, with Edenbridge Town station within 2km.

A positively prepared plan must also take proper account of the fact that this is an existing home and garden on the very edge of the settlement, wholly within the Green Belt and forming part of the transition between urban Edenbridge, Blossoms Park and open countryside. The existing dwelling is to be “re-provided,” so the net gain in homes is less than the headline 10 units, and the change from a relatively low-key farmstead edge to a compact housing cluster is not assessed in terms of landscape character, openness, or the role this parcel plays in defining a clear southern boundary to the town.

Justified – Evidence Base, Capacity and Key Constraints

1. Green Belt status and use of national “grey belt” policy

The SHELAA confirms that the site is “within Green Belt adjacent to Edenbridge” and that the Green Belt Stage 3 work classifies it as “grey belt”. It then concludes that, because of this grey-belt status, its partial PDL nature and Green Belt performance, the site is effectively “unconstrained” and “suitable for development.”

However, under the revised National Planning Policy Framework (December 2024, amended February 2025), “grey belt” is defined nationally as Green Belt land which is previously developed and/or land that does not strongly contribute to certain Green Belt purposes, and which excludes land where other key constraints (such as those referenced in footnote 7, including certain flood-risk designations and protected areas) provide a strong reason for restricting development.

In this context:

- A significant part of the 0.26ha comprises garden and undeveloped land around the existing dwelling, which is not previously developed land.
- 21.7% of the site lies in Flood Zone 2, yet the Council appears to apply the grey-belt label to the whole parcel without explaining how this interacts with the national exclusion of certain flood-risk areas from grey belt.
- There is no transparent evidence showing that this specific parcel does not strongly contribute to Green Belt purposes (such as checking sprawl or safeguarding the countryside setting of the town), nor a clear, published exceptional-circumstances case for releasing it, as required when altering Green Belt boundaries.

The updated NPPF also indicates that, where Green Belt release is necessary, plans should prioritise previously developed land and then grey-belt land ahead of other Green Belt, but this is about the order of consideration, not automatic release. The SHELAA’s leap from “grey belt” to “unconstrained and suitable” is therefore not robustly justified in light of the new national framework.

2. Landscape and settlement-edge character

The site lies within Landscape Character Area E2 Edenbridge South with medium sensitivity and forms part of the immediate transition between the town, Blossoms Park/cricket ground, and open countryside.

There is no landscape or visual assessment demonstrating:

- How a 10-dwelling scheme would appear in views from the park, cricket ground, Mill Hill, and the wider countryside.
- What height, layout and form would be required to maintain a soft, defensible settlement edge.
- What level of structural planting or open space is needed to mitigate visual impact and preserve a sense of openness.

Without this, the assumption that the Green Belt and settlement-edge character can accommodate 10 new dwellings here without harm is untested.

3. Capacity and intensity on a small Green Belt parcel

The SHELAA treats the **entire** 0.26ha as “developable” and assumes a yield of 10 dwellings, with the existing house to be re-provided. That implies quite a high level of built intensity for a Green Belt edge site once access, private gardens, parking, turning and landscape buffers to the park and countryside are accounted for. There is no design-led capacity study or indicative layout showing how:

- 10 units plus the replacement of the existing dwelling,
- adequate garden sizes and spacing,
- access and vehicle circulation, and
- meaningful landscape buffers

can all be accommodated without overdevelopment or a noticeable reduction in openness.

4. Flood risk and sequential approach

The SHELAA records that 21.7% of the site lies within Flood Zone 2 and notes that this “should be given further consideration” but then states that “there are no other constraints which would make this site unsuitable” and concludes that the site is effectively unconstrained and deliverable.

Given the updated NPPF requirement for a **risk-based, sequential approach** to flood risk, and its indication that some flood-risk areas are excluded from grey-belt status, this high-level treatment is not sufficient. There is no evidence at plan stage of:

- A sequential test demonstrating that reasonably available sites at lower flood risk have been considered first.
- A site-specific approach to keeping more vulnerable uses out of higher-risk areas of the site.
- Safe access/egress arrangements in a flood event.

Treating flood risk as a minor, application-stage matter for a small Green Belt site proposed in years 1–5 is inconsistent with the strengthened national emphasis on flood-risk management and with the new grey-belt parameters.

5. Heritage context

The SHELAA notes that the site is within 200m of the Edenbridge Conservation Area but offers no further analysis. While this may not be the leading constraint, a design-led capacity assessment should still explain how the form, height, and materials of 10 new dwellings at this edge-of-town location would respond to the nearby Conservation Area, particularly in longer views from the south.

Effective and Deliverable (Years 1–5)

The SHELAA states that the site has been submitted by the landowner and is “considered to be available in years 1–5”, with both availability and commencement set as “SDC Assumption” and completion anticipated in 2027. It also records that there is **no developer currently interested in the site**.

For a small, bespoke Green Belt scheme that must respond to flood risk, landscape sensitivity and the new national grey-belt parameters, these assumptions are optimistic:

- There is no outline concept or evidence of pre-application engagement.
- Viability has not been tested against potential abnormal costs for contamination checks (noted as “former farmland”), landscape and boundary treatments, flood mitigation, and Green Belt/heritage-sensitive design.
- The blanket statement that there are “no constraints that could render the site financially unviable at this time” is a high-level judgement that does not reflect the complexity introduced by Green Belt, grey-belt policy, flood risk, and landscape requirements.

The conclusion that EDEN7 is “Deliverable (Years 1–5)” therefore rests mainly on Council programming assumptions rather than clear evidence of achievability.

Consistency with National Policy (Including Grey Belt)

The revised NPPF (December 2024, as amended February 2025) requires that:

- Green Belt boundaries are altered only in **exceptional circumstances**, supported by robust evidence, and that openness and the Green Belt purposes are given substantial weight.
- New “grey belt” policy is applied consistently, using the national definition, including its exclusions (for example where other key constraints such as certain flood-risk categories apply).
- Development at the settlement edge is landscape- and design-led, avoiding sprawl and maintaining a clear, defensible boundary between town and countryside.
- More vulnerable uses such as housing are steered to areas of lowest flood risk through a sequential, risk-based approach.
- Early allocations are based on realistic assumptions about deliverability and viability.

In the case of EDEN7, the Plan:

- Relies on an internal grey-belt classification and partial PDL status to present a wholly Green Belt site as “unconstrained,” without a published exceptional-circumstances case or a clear explanation of how the national grey-belt definition and exclusions have been applied to this specific parcel.
- Offers no landscape or visual testing of a 10-dwelling scheme at this sensitive settlement edge.

- Treats Flood Zone 2 coverage as something to be “given further consideration” but then discounts it in drawing overall conclusions on suitability and deliverability.
- Places the site in the years 1–5 supply on the basis of Council assumptions, with no developer on board.

Taken together, this raises clear questions about the soundness of the allocation in relation to the updated national Green Belt, grey-belt, and flood-risk policies.

Amenity, Access, and Relationship with Mill Hill

The SHELAA notes that the site has an existing access from Mill Hill and that there is “capacity on the transport network,” with possible contributions towards improvements. No local highways or access assessment is presented. For a 10-unit scheme on Mill Hill, important issues such as:

- Visibility and junction safety,
- The cumulative impact of traffic from other Mill Hill allocations, and
- Access for refuse and emergency vehicles

are not assessed, yet the site is treated as straightforwardly deliverable.

Replacing a single dwelling and garden with a compact cluster of homes will also alter the relationship with Blossoms Park and the cricket ground, increasing overlooking, activity, and noise along this edge. These day-to-day amenity effects for current residents and park users are not discussed in the SHELAA conclusions.

Cumulative Impact on Edenbridge

EDEN7 is one of several allocations along Mill Hill and the southern edge of Edenbridge, including other Green Belt or edge-of-town sites. The combined effect on:

- Landscape character and the perceived outward spread of the town,
- The openness and function of the Green Belt at this edge, and
- Traffic and pedestrian safety on Mill Hill

has not been clearly assessed. Treating EDEN7 as a simple, early-years grey-belt site risks underestimating how incremental releases of small Green Belt parcels may collectively reshape the town’s southern boundary.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN8 – Land West of Ashcombe Drive and Meadow Lane

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN8 is a 3.29ha greenfield site comprising two pasture fields immediately west of the built-up area of Edenbridge. It is bounded by Hilders Lane to the north, existing housing on Ashcombe Drive and Meadow Lane to the east, further residential development to the west, and the railway line to the south. A public right of way (PROW) crosses the southern parcel from south-east to north-west. The land lies in the Green Belt, is classified as “grey belt” in the Council’s Stage 3 assessment and is recorded as having medium–high landscape sensitivity. The SHELAA proposes allocation for 80 dwellings, concludes the site is “developable”, and places delivery in years 6–10 of the plan period.

We acknowledge that the site adjoins the town, is close to services and could potentially be integrated with existing neighbourhoods. However, we consider that the treatment of Green Belt/grey belt policy, landscape sensitivity, access and network capacity, and deliverability evidence is incomplete, and that the allocation does not yet meet the Regulation 19 Tests of Soundness, particularly “justified” and “effective”.

Positively Prepared

The strategy of focusing some growth adjacent to a main town is understood, and the SHELAA notes that EDEN8 lies next to the urban confines of Edenbridge, within 400m of the settlement and within reasonable distance of both rail stations and the town centre.

A positively prepared plan must, however, balance this against the fact that the land is open Green Belt pasture forming part of the western countryside setting of Edenbridge, with a public right of way crossing the southern field and medium–high landscape sensitivity. The evidence does not clearly explain why this particular greenfield Green Belt parcel, which currently helps define the town’s western edge, has been selected ahead of alternatives, or how the proposed capacity of 80 dwellings has been informed by a landscape-, PROW- and settlement-edge-led design approach.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and grey-belt status

The SHELAA confirms that the site is “in Green Belt adjacent to Edenbridge” and that the Stage 3 work classifies it as grey belt. Under the revised NPPF (December 2024, as amended February 2025), grey belt is defined in Annex 2 as Green Belt land comprising previously developed land and/or other land that does not strongly contribute to any of Green Belt purposes (a), (b) or (d), and it excludes land where the application of footnote 7 policies (other than Green Belt) would provide a strong reason for refusing or restricting development.

In this context:

- EDEN8 is entirely greenfield grazing land rather than previously developed land.
- The fields sit between the western edge of Edenbridge and wider countryside, evidently contributing to checking sprawl and safeguarding the countryside from encroachment.
- While Arup’s district-wide Green Belt work underpins the grey-belt classification, the published SHELAA summary and Regulation 19 material do not clearly explain, in site-specific terms, why this particular open pasture is judged not to “strongly contribute” to purposes (a), (b) and (d), or how this judgment has been weighed against the role the land obviously plays in the town’s countryside setting.

The NPPF’s introduction of grey belt is intended to guide where Green Belt release might be least harmful, not to treat such land as automatically suitable or unconstrained. In the absence of a clear, accessible exceptional-circumstances narrative for this specific parcel, the justification for releasing EDEN8 remains weak.

Landscape sensitivity and settlement edge

The site is recorded as having medium–high landscape sensitivity, but the conclusions merely state that this “would require further consideration” and still present the land as suitable for allocation. There is no published landscape or visual assessment for EDEN8 demonstrating:

- How an 80-dwelling scheme would appear in views from Hilders Lane, from the PROW, from existing homes on Ashcombe Drive/Meadow Lane, and from countryside to the west.
- How layout, height and massing would create a defensible and attractive new settlement edge rather than an obvious westward sprawl.
- What structural planting, open space and buffer treatment would be required along the western and southern boundaries and around the PROW.

Without that, the assumed capacity of 80 homes cannot be said to be landscape-led or demonstrably compatible with the recorded sensitivity.

Capacity and density

The SHELAA treats the entire 3.29ha as “developable” and assumes 80 dwellings, implying a gross density of about 24 dph. No design-led capacity work is provided to show how:

- 80 units,
- internal roads and turning heads,
- on-plot and visitor parking,
- meaningful green buffers to the railway and open countryside, and
- protection and enhancement of the PROW corridor

will all fit comfortably without overdevelopment or unacceptable overlooking and overshadowing of existing homes on Ashcombe Drive and Meadow Lane.

Public right of way

A public right of way crosses the southern field diagonally from south-east to north-west. The conclusions do not address whether this will be retained on its current alignment, diverted, or incorporated as a green corridor; nor do they consider how enclosing this route with built development will change users’ experience of walking westwards out into open countryside. For a Green Belt site, the treatment of a PROW is a significant consideration that should inform both capacity and layout.

Access and transport network capacity

The SHELAA explicitly flags that “access [is] difficult” and that there is “no capacity on [the] transport network,” both recorded as red-rated constraints. Yet the conclusions treat these as matters that simply “need consideration,” while still deeming the site suitable and developable. There is no evidence on:

- Where a safe vehicular access (and any emergency access) could be formed to modern standards.
- How new junctions with Hilders Lane, Ashcombe Drive or Meadow Lane would operate with added traffic.
- How existing parking and turning constraints on nearby residential streets will be managed.

Given that the network is already noted as having no spare capacity, it is unclear how the site can accommodate 80 homes without substantial, and currently undefined, off-site works.

Noise from the railway

The assessment notes the need for a noise assessment due to the railway line along the southern boundary but provides no preliminary indication of likely mitigation (e.g. fencing, bunds, orientation, internal layout) or how this may constrain the developable area, external amenity space, or overall capacity.

Effective and Developable (Years 6–10)

The SHELAA categorises EDEN8 as “developable (6–10 years)” with an indicative yield of 80 dwellings. The promoter indicates that the land is “available now,” with anticipated commencement “by 2025” and completion “TBC”, and developer interest also “TBC”.

Key points:

- No developer is identified.
- Completion timescales are unspecified.
- Fundamental questions over access design, highway capacity, noise mitigation, and the treatment of the PROW remain unresolved.

The assertion that there are “no constraints that could render the site financially unviable at this time” is a broad judgement that does not account for potential abnormal costs associated with new access/junction works, network improvements, acoustic mitigation, landscape/Green Belt buffers, and PROW integration.

While 6–10 years is less ambitious than a 1–5 year classification, the Plan still relies on EDEN8 as a firm medium-term allocation without yet demonstrating that these constraints are realistically surmountable within that period.

Consistency with National Policy (Green Belt and Grey Belt)

The revised NPPF (December 2024, as amended February 2025) requires that:

- Green Belt boundaries are altered only in **exceptional circumstances** supported by robust, transparent evidence.
- Grey belt is treated as a subset of Green Belt which does not strongly contribute to purposes (a), (b) or (d), and which excludes land where footnote 7 policies would provide a strong reason for refusing or restricting development, with brownfield land considered first.
- Development at the settlement edge is landscape- and design-led, maintaining a clear distinction between town and countryside.
- Plans are underpinned by proportionate evidence on highway capacity, noise, and amenity.

In relation to EDEN8, the Plan relies on the grey-belt label to support release of wholly greenfield pasture that clearly contributes to the western countryside setting of Edenbridge, without presenting a clear site-specific exceptional-circumstances narrative or landscape-led capacity testing, and despite acknowledged difficulties with access and network capacity. This raises concerns about consistency with both the new grey-belt provisions and the underlying Green Belt and design principles in national policy.

Amenity, Access, and Local Highways

The SHELAA acknowledges difficult access and lack of network capacity but offers no site-specific highways assessment, even though the allocation fixes a capacity of 80 homes. For residents of Ashcombe Drive, Meadow Lane and surrounding streets, important amenity and safety questions remain unanswered:

- How construction traffic will reach the site without unacceptable disruption or damage to residential roads.
- Whether on-street parking pressures will increase and how this will affect emergency and refuse access.
- How new internal roads will connect to the existing network without creating rat-runs or unsafe junctions.

The effect on the public right of way and on public views from Hilders Lane and the PROW across open fields towards the countryside is also not addressed, even though these are relevant to landscape character and the enjoyment of the Green Belt.

Cumulative Impact on Edenbridge

EDEN8 is one of several Green Belt/grey-belt and edge-of-town allocations proposed around Edenbridge. The cumulative effects on:

- Landscape character and perceived westward sprawl,
- Overall Green Belt openness and the town's countryside setting, and
- Traffic and congestion on approach roads and local residential streets

have not been clearly assessed, yet EDEN8 alone would accommodate 80 homes on a prominent western fringe crossed by a public right of way.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN8

1. Regulation 19 Tests of Soundness

Positively Prepared

The brief fixes a relatively high net density of 40–60 dph and an indicative capacity of c.90 dwellings on a small, greenfield, edge-of-settlement site of only 3.29 ha with “medium to high landscape sensitivity”, without publishing any constraints-based capacity testing, master planning, or alternative scenarios. This is presented as a fait accompli rather than the outcome of transparent evidence.

Infrastructure is framed at “wider settlement” level only: additional primary places, a new secondary school, health centre capacity review, LCWIP walking/cycling improvements, PRoW upgrades and rail station improvements, plus increased sewerage, and clean water capacity. There is no clear explanation of why this particular site, in this location, at this density, is the appropriate contributor to these needs.

Justified

The brief provides no baseline transport, flood, utilities, or social infrastructure evidence for the site or for Edenbridge as a whole; it merely lists headline issues. Highways capacity, safety, and geometry on Hilders Lane, acknowledged as lacking a segregated pedestrian or cycle route, are not evidenced; the brief only states that “improvements” should be provided.

Flood risk is treated purely through generic SuDS design requirements, without requiring a site-specific FRA, or application of the Sequential and, where applicable, Exception Tests, notwithstanding the site’s proximity to the River Eden system and rail corridor. Utilities references are limited to generic statements that local sewerage and clean water capacity “to be increased” alongside development phasing, again with no evidence of existing network constraints or upgrade costs.

Effective

The delivery timeframe of 6–10 years is attributed to the promoter but is not supported by any information on landownership, access rights, utilities upgrades or the timing of education and health infrastructure, nor how these will be secured through S106/CIL and planning conditions.

The brief repeatedly uses non-committal language, “provide improvements,” “positively enhance,” “consideration will be given”, especially in relation to PRoW, Hilders Lane, and the potential Albion Way link. This weakens its effectiveness as a basis for decision-making and makes enforcement at application or appeal problematic.

The brief expressly states that, at this stage, infrastructure requirements are only given for the wider settlement and that specific site contributions will not be confirmed until Regulation 19. **This undermines the claim that the plan is genuinely infrastructure-led** and leaves delivery of necessary mitigation for EDEN8 uncertain.

Consistency with National Policy

The NPPF requires plans to be underpinned by proportionate, up-to-date evidence on infrastructure, transport, and flood risk and to set clear expectations for contributions. Here, the brief itself acknowledges that infrastructure planning is “ongoing” and defers specifics to a later stage, while still assigning a precise capacity and delivery period to EDEN8.

On climate and environment, the brief cross-refers to Policy CC2 and includes high-level expectations on SuDS, tree retention, and native planting, but does not specify any minimum standards for carbon performance, water efficiency, overheating resilience or biodiversity net gain. This falls short of the current emphasis in national policy on measurable and enforceable environmental outcomes.

2. Policy Soundness Beyond Reg 19

The brief confirms that all sites are expected to be “fully policy compliant” and highlights key policies: Sustainable Movement and Movement Network (T1, T2), Affordable Housing (H2), Low Carbon and Climate Resilient Development (CC2) and Landscape (NE1). However:

- No clear narrative is provided showing how development at EDEN8 specifically helps deliver Edenbridge’s strategic infrastructure needs (schools, health, rail, and utilities) that are flagged as “wider settlement infrastructure” and tied to the IDP.
- Open space and play expectations are expressed only as a requirement to integrate open space along the PRow, with no link to any quantitative standards or typologies.

This creates scope for challenge at examination that EDEN8 is being pushed to a pre-determined capacity without a robust, policy-led justification or clear connection to the plan’s stated objectives for infrastructure, healthy communities, and design quality.

3. Site-Specific Robustness

Highways and Movement

The site is accessed from Hilders Lane, a rural lane currently lacking any segregated pedestrian or cycle route. The design requirements merely state that improvements to walking and cycling infrastructure along Hilders Lane should be provided, without defining:

- minimum footway width or continuous provision.
- junction standards, visibility, or any trip thresholds; or
- how safe access for vulnerable users will be secured at both ends.

For the PRow and Albion Way interface, the brief both insists that the historic route is retained “in its current form” and that it is “positively enhanced,” while also acknowledging overgrowth

and lack of surveillance to the rear of Albion Way. The potential pedestrian link to Albion Way is downgraded to “consideration will be given,” with no firm obligation, lighting standard, or requirement for natural surveillance.

Social Infrastructure and Utilities

The brief lists significant settlement-wide needs (additional primary capacity; new secondary school; health centre capacity review; rail station improvements; sewerage and water upgrades) but does not specify any EDEN8-specific obligations, trigger points, or indicative contribution levels. This omission is particularly problematic given the acknowledged existing pinch-points and the reliance on the Infrastructure Delivery Plan Statement, itself still emerging.

Rail Corridor and Amenity

Although the site is directly bounded by the railway line to the south, no requirements are set for noise and vibration assessment, separation distances, acoustic design, landscape buffering, or rail safety (trespass fencing, drainage interface).

4. Impacts on Edenbridge and Local Communities

The brief recognises that additional education, health, transport, and utilities capacity will be needed for Edenbridge as a whole but gives no assurance that EDEN8 will make a proportionate, timely contribution to these items. In combination with other allocations, this risks cumulative increases in traffic, school rolls, GP lists and pressure on sewerage and water infrastructure without a clear mitigation strategy.

Hilders Lane’s role as a rural edge is likely to change substantially with dwellings facing the lane and intensified vehicle access, yet there is no assessment of impacts on local character or on the amenity of existing residents along Ashcombe Drive, Meadow Lane, and nearby properties.

5. Sustainability and Environment

Positive elements include:

- requirement to retain and strengthen tree-lined boundaries.
- retention and enhancement of all mature trees and hedgerows of ecological or visual value; and
- SuDS to be designed as multifunctional corridors with habitat and amenity value.

However, there is no:

- explicit minimum biodiversity net gain target (such as 10% using the statutory metric).
- requirement for greenfield run-off rates, exceedance routes, or long-term SuDS maintenance; or
- binding carbon, energy, or water efficiency standards beyond generic policy cross-references.

These omissions weaken the ability of the LPA to secure genuinely low-carbon, climate-resilient development at application stage.

6. Deliverability and Practicality

Combining:

- a net density of 40–60 dph and c.90 units.
- retention of mature trees and hedgerows.
- integrated open space along the PRoW.
- SuDS corridors; and
- meaningful upgrades to Hilders Lane and local PRoW,

may not be feasible on a 3.29 ha site without significant design compromises or subsequent claims that full policy compliance (notably affordable housing and infrastructure contributions) is unviable.

The explicit deferral of site-specific infrastructure contributions to Reg 19, alongside an “ongoing” IDP, leaves a material risk that development could proceed ahead of, or without, necessary education, health and network upgrades, contrary to an infrastructure-led approach.

7. Legal and Procedural Vulnerabilities

Key phrases create potential loopholes:

- “consideration will be given to providing a pedestrian connection onto Albion Way.”
- “provide improvements” to Hilders Lane and the PRoW.
- PRoW to be retained “in its current form” yet also “positively enhanced.”

Such wording is open to wide interpretation at appeal and weakens the brief as a material consideration. The absence of quantified obligations or minimum standards for key matters (BNG, SuDS performance, active travel provision, noise mitigation) increases the risk of inconsistent decision-making and challenge.

Recommended Amendments (for inclusion in representations)

To strengthen soundness, enforceability and deliverability, the brief should be amended along the following lines:

1. Infrastructure and Phasing

“Planning permission will not be granted unless the development makes proportionate contributions, through Section 106 and/or CIL, towards: (a) additional primary school capacity serving Edenbridge; (b) a new secondary school in the Edenbridge planning area; (c) improvements to Edenbridge Town and Edenbridge railway stations; and (d) identified upgrades to the local sewerage network and clean water supply. No dwelling shall be occupied until an

agreed phasing and funding strategy for these items, proportionate to the contribution from EDEN8, has been secured.”

2. Highways and Active Travel

“Vehicular access from Hilders Lane must incorporate continuous, lit footway provision and any necessary junction improvements, informed by a Transport Assessment demonstrating safe and efficient operation. The development shall deliver a fully lit, surfaced pedestrian and cycle route along the existing PRow and a secure, overlooked connection to Albion Way, secured by legal agreement.”

3. Flood Risk and SuDS

“A site-specific Flood Risk Assessment shall demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere, applying the Sequential Test and, where required, the Exception Test. SuDS shall achieve greenfield run-off rates, provide clearly defined exceedance routes and deliver ecological and amenity benefits.”

4. Biodiversity and Trees

“The development shall deliver a minimum 10% biodiversity net gain, calculated using the statutory metric. All mature trees and hedgerows of ecological or visual value shall be retained and enhanced unless loss is clearly justified and fully compensated on site.”

5. Capacity and Density

“The indicative capacity of approximately 90 dwellings is subject to demonstrable compliance with all design, landscape, highways, flood risk, infrastructure, and environmental requirements. Where such compliance cannot be achieved, the capacity shall be reduced accordingly.”

On the basis of these concerns, EDEN8 as currently briefed is vulnerable to being found **not justified, not effective and not fully consistent with national policy**, and the brief should be amended before the allocation is taken forward.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN9 – Land North of Skinners Lane

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN9 is a 14.39ha greenfield site immediately east of Edenbridge, comprising several agricultural fields bounded by Four Elms Road and existing housing to the west, Skinners Lane to the south, the railway line to the north and open countryside to the east. A public right of way (PROW) runs north–south through the land. The site lies wholly within the Green Belt and is classified as “grey belt” in the Council’s Stage 3 assessment. The SHELAA treats almost the entire site (14.38ha) as developable, proposes a yield of 150 dwellings, and concludes that the site is “suitable” and “developable (6–10 years)”.

We acknowledge that the land adjoins the built-up area of Edenbridge and is closer to services than more remote rural locations. However, the evidence does not robustly address Green Belt and grey-belt policy, landscape sensitivity, public access, flood risk, and highways capacity. Treating the site as effectively “unconstrained” and suitable for 150 homes does not satisfy the Regulation 19 Tests of Soundness, particularly “justified” and “effective”.

Positively Prepared

The Plan’s broad strategy to direct a proportion of growth to land adjoining a main town is understood, and the SHELAA notes that EDEN9 is adjacent to the urban confines of Edenbridge, within 400m of the settlement and within 2km of the town centre and both stations.

A positively prepared plan must also weigh the role of this land as open Green Belt countryside forming part of the eastern setting of Edenbridge, with a PROW crossing it and medium–high landscape sensitivity across over 93% of the site. The Regulation 19 material does not clearly explain why this extensive greenfield parcel, which performs an obvious countryside and separation function between the town and the east, has been selected ahead of other options, or how the proposed 150-dwelling capacity has been informed by landscape, Green Belt, and public access considerations.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and national “grey belt” policy

The SHELAA confirms that the site is “in the Green Belt adjacent to Edenbridge” and records the Stage 3 classification as “grey belt”. Under the revised NPPF (December 2024, updated February 2025), grey belt is defined in Annex 2 as Green Belt land comprising previously developed land and/or other land which does not strongly contribute to Green Belt purposes (a), (b) or (d), and it expressly excludes land where policies relating to the assets and areas listed in footnote 7 (other than Green Belt itself) would provide a strong reason for refusing or restricting development.

In this context:

- EDEN9 is wholly greenfield agricultural land; it is not previously developed.
- The fields sit between Edenbridge and open countryside, helping to check eastward sprawl and safeguard the countryside from encroachment, so they clearly contribute to Green Belt purposes even if the Stage 3 work scores them less highly against some criteria.
- Parts of the site fall within Flood Zones 2 and 3, which the SHELAA quantifies as 1.58% and 6.63% of the total area, respectively. This level of decimal precision reflects a GIS overlay, but it is not accompanied by any clear explanation of what these areas actually mean spatially on the ground, how they constrain the developable footprint, or why they are apparently being treated as negligible rather than as triggers for a proper sequential, layout and open-space response. Whether it is 1.5% or 2%, the presence of Flood Zone 3 land within a large Green Belt release remains significant for masterplanning, drainage, open space and emergency access and should be transparently addressed in the evidence base.

We recognise that the Council’s Green Belt work is technically underpinned, but the SHELAA and Regulation 19 material do not provide a clear, accessible, site-specific narrative showing how EDEN9’s contribution to Green Belt purposes has been assessed under the new national grey-belt definition, or why this open pasture is an appropriate candidate for Green Belt release ahead of other options. The NPPF’s introduction of grey belt guides where Green Belt release might be least harmful; it does not automatically render such land “unconstrained” or suitable for large housing estates.

Landscape sensitivity and settlement edge

EDEN9 is recorded as having medium–high landscape sensitivity across 93.6% of its area. Yet the conclusions simply state that this “will need consideration” and then describe the site as suitable and effectively unconstrained. There is no published landscape or visual assessment demonstrating:

- How 150 dwellings would appear in views from Skinners Lane, Four Elms Road, the PROW running through the site, and from countryside to the east.
- How the layout, height and built form would create a defensible and attractive new settlement edge rather than a conspicuous eastward extension of the town.

- What scale of structural planting and open space would be required along the eastern boundary and around the PROW to mitigate visual impact and maintain a sense of openness.

Without this, the assumed capacity of 150 dwellings is not shown to be landscape-led or compatible with the site's recorded sensitivity.

Capacity, density, and design-led testing

The SHELAA effectively treats the entire 14.38ha as developable and assigns 150 dwellings, equating to a very low gross density of around 10–11 dwellings per hectare across the released Green Belt. In the context of a Council-wide strategy that seeks to optimise densities, this unusually low figure raises a serious concern that either:

- the true housing capacity and impact of releasing this much Green Belt are being understated at Regulation 19; or
- there will be future pressure to intensify the site beyond the 150 dwellings currently shown.

In either case, the Plan has not transparently justified why such an extensive Green Belt release is necessary for this level of development.

At this stage, capacity has been derived by applying a broad density across almost the whole site area. For a Green Belt site of this scale and sensitivity – with medium–high landscape sensitivity, flood zones, a PROW and railway noise – we would expect Regulation 19 allocations to be supported by at least proportionate, design-led testing (for example, indicative layouts or masterplanning) to show that 150 dwellings can in fact be accommodated alongside floodplain, landscape buffers, the PROW corridor and good standards of amenity for both new and existing residents. Without such testing, it is unclear whether the headline capacity and the extent of “developable area” are realistic.

Public right of way and countryside access

A public right of way runs through the site from Skinners Lane up to the northern boundary, currently offering residents a direct route from the town into open fields. The SHELAA notes its presence, but the conclusions do not address:

- Whether the route will be retained on its existing alignment or diverted.
- How enclosing it within housing will affect users' experience of leaving Edenbridge and walking into open countryside.
- Whether a meaningful green corridor with open views will be maintained, or whether the PROW will become a narrow, enclosed path between back gardens and fences.

For a Green Belt/grey-belt site, the treatment of public access and views is a material consideration that should inform both capacity and layout.

Flood risk and sequential approach

Beyond quoting percentages for Flood Zones 2 and 3, there is no clear evidence at plan stage of:

- A sequential test demonstrating that housing cannot reasonably be steered to sites at lower flood risk.

- A clear approach to keeping more vulnerable uses out of the Flood Zone 3 areas and managing residual risk.
- Safe access and egress arrangements in a flood event, particularly given the adjacency to the existing urban area.

This falls short of the risk-based approach now emphasised in the updated NPPF, especially for large-scale Green Belt releases.

Contamination, odour, and noise

The SHELAA notes the need for a contaminated land assessment, an odour assessment, and a noise assessment due to the railway. No preliminary work is presented on:

- Likely contaminant sources and remediation scope.
- The nature and source of potential odour constraints and how they might limit the developable area or affect amenity.
- Acoustic mitigation requirements close to the railway and their effect on layout, garden quality, and the true developable area.

These matters can materially affect layout, cost and the quality of living conditions and should inform, rather than follow, a decision to allocate 150 homes.

Effective and Developable (Years 6–10)

The SHELAA records that the landowner considers the site “available now,” with anticipated commencement in 2026–2030 and completion within 3–5 years of commencement. Developer interest is identified (Cooper Estates). The Council therefore classifies the site as “developable (6–10 years)” and proposes allocation for 150 units.

However:

- Access is acknowledged as requiring a new primary access plus a secondary emergency access, and network capacity is described as “limited” and requiring improvements.
- There is no site-specific highways or junction design work showing where those accesses would be located or what off-site works are likely to be required.
- No viability testing is presented to show that the combination of access works, network improvements, landscape buffers, flood mitigation, noise and odour mitigation and any Green Belt design requirements can be absorbed while remaining attractive to the developer at the proposed capacity.

The statement that there are “no constraints that could render the site financially unviable at this time” is therefore a broad judgement rather than the product of proportionate, site-specific testing.

Consistency with National Policy (Green Belt and Grey Belt)

The revised NPPF requires that:

- Green Belt boundaries are altered only in **exceptional circumstances**, supported by robust and transparent evidence.
- Grey-belt land is still Green Belt, and its identification does not remove the need to consider openness and the Green Belt purposes, nor the exclusions in footnote 7 (including some flood-risk areas), within a clear “brownfield first” strategy.
- Development at the settlement edge is landscape- and design-led, avoiding sprawl and maintaining a clear distinction between town and countryside.
- Plans are underpinned by proportionate evidence on highway capacity, noise, odour, flood risk, and amenity, particularly for large sites.

In relation to EDEN9, the Plan relies heavily on the grey-belt label and adjacency to a “top tier settlement” to justify a large release of open countryside, but without a clear parcel-specific exceptional-circumstances narrative, without design-led capacity testing of the 150-dwelling figure, and without resolved access and flood-risk strategies. That approach risks inconsistency with both the new grey-belt provisions and long-standing Green Belt and flood-risk policies in national guidance.

Amenity, Access, and Local Highways

The SHELAA acknowledges limited capacity on the transport network and the need for new and emergency accesses but does not present a highways strategy for 150 dwellings. For residents on Four Elms Road, Skinners Lane and the adjoining estates, key questions remain unanswered:

- Where will the main and emergency access points be formed, and what junction changes will be needed?
- How will additional traffic from 150 homes affect safety, congestion and walking routes on Skinners Lane and Four Elms Road?
- How will construction traffic be managed to avoid significant disruption to the existing community?

The effect on the PROW, and on public views from Skinners Lane and along the route over open fields towards the countryside, is also not addressed, even though these are relevant to landscape character and enjoyment of the Green Belt.

Cumulative Impact on Edenbridge

EDEN9 is one of several substantial Green Belt/grey-belt and edge-of-town allocations around Edenbridge. Taken together, they will materially alter the town’s relationship with its countryside setting and place additional pressure on local roads and services. The Regulation 19 material does not transparently assess the cumulative effect of bringing forward EDEN9 (150 homes) alongside other allocations on:

- Green Belt openness and perceptions of sprawl, particularly to the east and south.
- Landscape character and the experience of using local PROWs; and
- Traffic and congestion on the main approach roads into the town.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN9

1. Regulation 19 Tests of Soundness

Positively Prepared

- The brief relies on a *promoted* capacity of 150 dwellings and a density range of 40–60 dph without reconciling these figures or demonstrating how the capacity has been tested against constraints, infrastructure, or character. On a 14.39 ha greenfield site at the edge of Edenbridge, 150 dwellings imply a very low gross density compared with the policy range, leaving open the possibility of substantial uplift later with no clear evidence base.
- The site is explicitly linked to settlement-wide infrastructure needs: additional primary places, a new secondary school and health capacity review, but there is no mechanism in the brief to secure land, or contributions proportionate to the level of growth or the cumulative impact with other Edenbridge sites and the consented 340-home scheme to the south-east.

Justified

- The brief does not explain why this particular greenfield site in a medium-to-high sensitivity landscape is preferred over reasonable alternatives, nor does it summarise any comparison with other Edenbridge or district sites in the SHELAA or sustainability appraisal.
- Key constraints (adjacent sewage treatment works, railway, Flood Zones 2 and 3 along the southern boundary, existing PROW, and landscape sensitivity) are acknowledged only at a high level and are not translated into quantified capacity reductions, fixed developable areas or non-negotiable buffers.
- The brief leans heavily on the emerging IDP and a future Regulation 19 stage to define specific transport, education, and utilities schemes. That deferral is problematic when the site is already listed as a housing allocation (EDEN9 – 150 units) in Policy ST2.

Effective

- Coordination with the adjacent consented scheme (20/02988/OUT for 340 dwellings plus secondary school land, station car park, etc.) is described as something that “must” occur, but no delivery tools are identified: there is no requirement for a joint masterplan, linked Section 106 triggers, land equalisation or timing arrangements.

- Infrastructure requirements are generic, expressed as “will be expected to contribute towards” for the wider settlement, with explicit confirmation that specific site contributions will only be defined at Regulation 19. This weakens certainty on deliverability and phasing.

Consistent with National Policy

- NPPF requirements for up-to-date, proportionate evidence on flood risk and infrastructure are not clearly met: the brief allows development in areas affected by Flood Zones 2/3 subject to later design measures, but it does not fix a sequential layout, exclude the highest-risk land from built development, or lock in multi-functional flood storage/SuDS as open space.
- The approach to design and landscape is framed aspirationally (“set a new benchmark,” “enhances the landscape”) rather than as enforceable, measurable outcomes in a sensitive Low Weald edge location.

2. Wider Policy Soundness

- The proposed density band (40–60 dph) follows H7 edge-of-urban guidance but is not reconciled with “medium to high landscape sensitivity” or the Edenbridge Character Area Assessment; there is no requirement that the site sit at the *lower* end of the range or below it if necessary to protect character.
- The brief references movement, climate, landscape, and amenity policies but does not secure the strategic objectives for infrastructure and education in Chapter 9 (including the recognised need for a new secondary school and safeguarded land in Edenbridge).
- By keeping key matters “to be refined” at Regulation 19 or application stage, the brief creates avoidable ambiguity that can be challenged at examination as insufficient to demonstrate a sound, deliverable allocation in Edenbridge.

3. Site-Specific Robustness

- **Flood risk and drainage:** Flood Zones 2 and 3 along the southern boundary are acknowledged but not spatially fixed. The brief does not require all built development to be located outside Flood Zone 3, nor does it require the floodplain to be safeguarded as open space/SuDS with no land-raising.
- **Odour and amenity:** Proximity to the sewage treatment works is treated simply as a need for a “noise and odour assessment.” There is no explicit requirement for agreed stand-off distances, no-build buffer zones, or mitigation to Southern Water’s satisfaction, which leaves the allocation vulnerable if detailed odour modelling later identifies unacceptable effects.
- **Movement and access:** The brief calls for a comprehensive walking and cycling network and improvements to the nearby railway pedestrian crossing but does not safeguard specific route alignments, junction upgrades, or connections to the Local Cycling and Walking Infrastructure Plan (LCWIP) network. **At time of writing there is no LCWIP available for Edenbridge during the Regulation 18 consultation.**

- **Utilities:** It notes the need to increase local sewerage and clean water capacity but provides no baseline capacity assessment, no phasing triggers, and no requirement to ensure network upgrades are completed before occupation beyond generic wording.

4. Impacts on Edenbridge and Local Communities

- EDEN9 is one of several greenfield allocations around Edenbridge, yet the brief does not consider cumulative traffic, parking, and station access effects on a settlement already identified as a congestion hotspot on the bypass.
- Education and health impacts are recognised only in general terms (“additional primary places,” “new secondary school,” “health centre capacity under review”) with no indication of where the secondary school will be located, how land will be secured, or how EDEN9 will contribute.
- There is no reference to Edenbridge’s existing shortfalls in open space, sports, or community facilities, nor any requirement for on-site provision beyond policy OS1, despite the site’s size and proximity to other new neighbourhoods.

5. Sustainability and Environment

- SuDS and “landscape-led” design are mentioned but not tied to specific performance standards (run-off rates, biodiversity units, net gain percentage, tree planting numbers, or carbon outcomes) or to the Level 1/2 SFRA findings.
- The brief does not require measurable biodiversity net gain on-site or specify how green infrastructure in EDEN9 will connect to wider ecological networks north of the railway and east into open countryside.
- Climate resilience is described in generic terms; there is no requirement for future-proofed building fabric, heat mitigation, or low-carbon energy measures beyond cross-reference to CC2.

6. Deliverability and Practicality

- The brief uses the promoter’s 150-unit figure and a broad density range, leaving room for later reinterpretation without revisiting transport, education, or utilities evidence.
- Transport and education mitigation for Edenbridge are left to future IDP iterations and Regulation 19. This prevents a clear demonstration that EDEN9, together with other Edenbridge sites, is deliverable within known highway, school, and utilities constraints.
- The requirement for a Design Code under DE6 is positive but remains process-based; the brief does not specify the key non-negotiables that the code must secure (maximum building heights, edge treatments, view corridors, floodplain protection).

Specific modifications sought

- Fix a *maximum* residential capacity for EDEN9 derived from a constraint-led developable area, rather than an open-ended density range, and require any uplift to be justified through updated transport, flood, and infrastructure evidence.
- Introduce a mandatory requirement for a joint masterplan and coordinated Section 106 framework for EDEN9 and the 20/02988/OUT scheme, securing delivery and timing of the secondary school, station car park, main access routes, and strategic green infrastructure.
- Insert clear phasing triggers: no occupation beyond defined thresholds until specified water, wastewater, education, and station access upgrades identified in the IDP are committed and funded.

7. Legal and Procedural Vulnerabilities

- The extensive use of soft language (“will be expected to,” “should,” “will help”) in relation to infrastructure, movement, flood risk, and amenity creates scope for developer argument at appeal that these are aspirations, not requirements.
- Deferring identification of specific highways schemes, school locations and utilities upgrades to a later IDP version risks a finding at Regulation 19 that the allocation is not *justified* or *effective*, particularly given known Edenbridge constraints already acknowledged by providers.
- Absence of fixed buffers and sequential layout in relation to Flood Zones 2/3 and the sewage treatment works creates litigation risk if later technical studies show parts of the allocation to be unsafe or unfit for residential use; objectors can argue that the allocation itself was unsoundly drawn.

Representation / objection line

EDEN9, as currently framed, is not justified or effective because it relies on a promoter-led capacity, defers key infrastructure, transport, flood, and amenity decisions to later stages, and fails to lock in the mitigation needed to make a large greenfield extension at a sensitive, constrained edge of Edenbridge acceptable in planning and legal terms.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN10 – Land at Crouch House Road

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN10 is an 18.23ha greenfield site immediately west of Edenbridge. It comprises four large agricultural fields separated by established hedgerows, with part of the land used for grazing and the remainder unused. The site is bounded by Crouch House Road and housing to the north and east, further residential development to the south, and open countryside to the west. It lies wholly within the Green Belt, is classified as “grey belt” in the Stage 3 assessment and has medium–high landscape sensitivity. The SHELAA treats the entire 18.23ha as developable, proposes a yield of 350 residential units (including 50 specialist units), concludes that the site is “developable (years 6–10)”, and the Plan allocates it for 350 homes.

We recognise that the site is adjacent to the town and close to services relative to more remote rural locations. However, we consider that the treatment of Green Belt/grey-belt policy, landscape sensitivity, ancient woodland, highway capacity and the scale and density of development is not yet robust, and that the allocation does not clearly meet the Regulation 19 Tests of Soundness, particularly “justified” and “effective”.

Positively Prepared

The SHELAA notes that EDEN10 is adjacent to the urban confines of Edenbridge, in Flood Zone 1, and within walking distance of the town and both railway stations. These are positive locational factors.

A positively prepared plan must also grapple with the fact that this is a very large greenfield release (over 18ha) forming much of the western countryside setting of Edenbridge, and that it is wholly in the Green Belt with medium–high landscape sensitivity and a relationship to ancient woodland. The evidence does not clearly explain why this extensive countryside parcel has been preferred over other options, or how the proposed 350-unit figure (including 50 specialist units) has been calibrated against the landscape, Green Belt, and infrastructure capacity of this part of the town.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and grey-belt status

The SHELAA confirms that the site is “within Green Belt” and that Stage 3 classifies it as “grey belt”, before concluding that, due to its “unconstrained nature”, grey-belt status and sustainable location, it is suitable for development. Under the revised NPPF, grey belt is defined nationally as Green Belt land that is previously developed and/or land which does not strongly contribute to certain Green Belt purposes, and which excludes land where other key designations provide a strong reason to restrict development.

In this case:

- EDEN10 is entirely greenfield agricultural land, not previously developed.
- It forms a substantial part of the open gap between the existing western edge of Edenbridge and the wider countryside, helping to check sprawl and safeguard the countryside from encroachment.
- The SHELAA summary does not provide a clear, site-specific explanation of why this open farmland is judged not to “strongly contribute” to relevant Green Belt purposes, or how this judgement has been weighed against the obvious role the land plays in the town’s countryside setting.

Grey-belt classification is intended to guide where Green Belt release might be least harmful, not to treat such land as automatically unconstrained. The leap from “Green Belt / grey belt” to “unconstrained and suitable for development” is not transparently justified in the EDEN10 evidence.

Landscape sensitivity and settlement edge

The site is recorded as having medium–high landscape sensitivity, but the conclusions simply note that this “would require further consideration” and nevertheless describe the site as suitable. There is no published landscape or visual assessment for EDEN10 showing:

- How a 350-dwelling scheme would appear in views from Crouch House Road, Lingfield Road, nearby homes and the open countryside to the west.
- How the layout and built form would create a clear, defensible, and attractive western edge to Edenbridge rather than a large and exposed westward expansion.
- What scale of structural planting and open space would be required along the western boundary and internal field breaks to mitigate visual impact and maintain a sense of openness.

Without this, the proposed capacity cannot be said to be landscape-led or fully reconciled with the recorded sensitivity.

Ancient woodland buffer

The SHELAA notes that a very small part of the site (0.01%) lies within Ancient and Semi-Natural Woodland, and that the wider site is partly within the ancient woodland buffer. The conclusions merely state that this “would require further consideration.” There is no analysis of:

- Where exactly development is expected to sit in relation to the woodland and buffer.
- What stand-offs or buffer strips would be required to protect the woodland edge; or
- How these areas would reduce the effective developable area for housing and roads.

These matters materially affect where homes can be built and should inform, not follow, the decision to allocate the full 18.23ha as developable.

Capacity, density, and use of the full Green Belt parcel

The SHELAA treats the entire 18.23ha as developable and assigns 350 dwellings (including 50 specialist units), which implies a gross density of around 19 dwellings per hectare across the whole Green Belt release. In the context of a plan that aims to optimise densities, this raises particular concerns:

- Such a low gross density over a very large Green Belt site suggests either that the true housing capacity and impact of releasing this much land are being understated now, or that there will be future pressure to increase numbers beyond the 350 currently shown.
- In either case, the Plan has not transparently justified why an 18.23ha Green Belt release is necessary to achieve this level of development, especially when some of that land will have to be used for woodland buffers, open space, drainage, and structural planting.

Capacity has been derived by applying a broad density across essentially the whole parcel. For a Green Belt site of this size and sensitivity, containing multiple fields, hedgerows and a relationship to ancient woodland, we would expect Regulation 19 allocations to be supported by proportionate, design-led testing (for example, indicative layouts or masterplanning) to demonstrate how 350 dwellings (including 50 specialist units), access roads, parking, green infrastructure and woodland stand-offs can all be accommodated while still delivering a high-quality settlement edge and protecting openness. That evidence is not presented in the SHELAA summary.

Access and transport network capacity

The SHELAA records that a new or additional site access is required and that there is “limited capacity on [the] transport network” requiring improvements. These are not minor considerations for a 350-home scheme. However:

- No site-specific highways assessment is provided to show where new junctions would be located on Crouch House Road or connecting routes, what form they would take, or how they would perform.
- There is no analysis of the cumulative impact of 350 dwellings on traffic flows, safety, and pedestrian movement along Crouch House Road, Lingfield Road and routes into the town centre.
- Construction traffic implications for the existing residential streets are not addressed.

Despite acknowledging limited network capacity, the conclusions still describe the site as having an “unconstrained nature,” without demonstrating that these issues can be resolved in practice.

Effective and Developable (Years 6–10)

The landowner indicates that the site is “available now,” with anticipated commencement in 2026–2030 and completion “within 5 to 7 years of adoption/consent”. A developer is reported to be interested, and there are said to be no legal constraints. The Council therefore categorises the site as “developable (years 6–10)”.

For a strategic, 350-unit Green Belt site, this remains a high-level judgement:

- There is no published viability work showing that the scheme can comfortably absorb the costs of new access and junction works, network improvements, landscape buffers, ancient woodland protection, on-site open space, and specialist housing provision.
- Key design and infrastructure questions (access strategy, internal layout, green infrastructure, relationship to woodland and countryside) are unresolved yet do not appear to temper the “no constraints that could render the site financially unviable” conclusion.

While a 6–10 years trajectory is more realistic than an early-years allocation, the evidence that 350 homes can be delivered on this sensitive Green Belt site within that period remains limited.

Consistency with National Policy (Green Belt and Grey Belt)

National policy requires that:

- Green Belt boundaries are altered only in **exceptional circumstances**, supported by robust, transparent evidence.
- Grey-belt land is still Green Belt; its identification does not remove the need to give substantial weight to openness and the purposes of the Green Belt, nor does it automatically justify large estate-style development.
- Development at the settlement edge should be landscape- and design-led, maintaining a clear distinction between town and countryside and protecting valued landscapes and ancient woodland.
- Strategic allocations should be supported by proportionate evidence on transport capacity and viability.

In relation to EDEN10, the Plan relies heavily on grey-belt status and adjacency to a “top tier settlement” to justify a very large release of open countryside, but without:

- A clear, parcel-specific exceptional-circumstances narrative.
- Design-led testing of the 350-dwelling figure in the context of medium–high landscape sensitivity and ancient woodland; or
- A resolved access and highways strategy for a development of this scale.

This raises concerns about consistency with both the new grey-belt provisions and long-standing Green Belt and design policies.

Amenity, Access, and Local Highways

For existing residents around Crouch House Road and the southern edge of Edenbridge, a 350-home scheme would have significant implications for traffic, parking, and general activity, yet the SHELAA evidence is limited to generic references to “limited capacity” and the need for improvements. It does not address:

- How additional vehicle movements will affect safety and congestion on Crouch House Road and links to Lingfield Road and the town centre.
- How safe walking and cycling routes from the new development into Edenbridge will be provided, particularly for older residents in the 50 specialist units: or
- How construction traffic will be managed to minimise disruption.

Day-to-day amenity issues such as overlooking and the transition from a rural outlook over fields to a major housing development are not explored in the conclusions, despite the scale of change proposed.

Cumulative Impact on Edenbridge

EDEN10 is one of the largest single allocations proposed around Edenbridge and sits alongside other Green Belt/grey-belt releases to the west, south and east. Taken together, these sites would significantly extend the town’s footprint and reshape its relationship with the surrounding countryside. The Regulation 19 material does not clearly assess:

- The combined impact on Green Belt openness and the perception of sprawl.
- The cumulative effect on landscape character and the western approach to Edenbridge; or
- The overall pressure on the local road network and town-centre junctions arising from multiple large sites.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN11 – Land at Lingfield Road

NEDRA Strongly Disagree

Overview of the Proposed Allocation

Site HO/21/00168 (Regulation 18 ref. EDEN11) is a 2.12ha greenfield site north of Lingfield Road. It comprises a single parcel of farmland bounded by Lingfield Road to the south, existing residential development to the east and west, and agricultural land to the north and west. There is an existing access from Lingfield Road. The land lies wholly within the Green Belt, is classified as “grey belt” in the Stage 3 work and is recorded as having 100% medium–high landscape sensitivity. The SHELAA treats the whole 2.12ha as developable, proposes 75 new-build dwellings, concludes the site is “suitable” and “developable (years 6–10)”, and the Plan allocates it for 75 units.

We recognise that the site is relatively close to Edenbridge’s services and both stations compared with more remote rural sites. However, we are concerned that the assessment underplays Green Belt and grey-belt issues, landscape sensitivity, the fact that the site does not directly adjoin the existing urban confines, and the reliance on broad density assumptions rather than design-led testing. In our view the allocation is not yet clearly “justified” or “effective” under the Regulation 19 Tests of Soundness.

Positively Prepared

The SHELAA notes that EDEN11 is adjacent to Edenbridge (within 400m of the settlement), within 800m of the central area and within 2km of Edenbridge Town station. Those are positive locational factors in accessibility terms.

A positively prepared plan must also recognise that this is open farmland forming part of the rural setting to the north and west of existing frontage housing on Lingfield Road, and that it lies wholly within the Green Belt with medium–high landscape sensitivity and within 200m of two listed buildings. The SHELAA explicitly acknowledges that the site does *not* directly border the urban confines, and that it is instead adjacent to EDEN10 (Crouch House Road), which the Council also considers suitable. The sustainability of EDEN11 therefore depends heavily on EDEN10 coming forward as planned; if EDEN10 is delayed, reduced, or not delivered, EDEN11 would represent a freestanding projection of development into the Green Belt along Lingfield Road rather than a logical rounding-off of the town. This interdependence is not addressed in the allocation.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and grey-belt status

The site lies completely within the Green Belt and is classified as “grey belt” at Stage 3. Under the revised NPPF (December 2024, updated February 2025), “grey belt” is defined as land in the Green Belt that is previously developed and/or land that does not strongly contribute to Green Belt purposes (a), (b) or (d), and it excludes land where other key policies listed in footnote 7 would provide a strong reason for refusing or restricting development.

In this case:

- EDEN11 is wholly greenfield farmland, not previously developed.
- It forms part of the rural land north of Lingfield Road which contributes to the countryside setting of Edenbridge and to checking north-westward sprawl.
- The SHELAA summary relies on the grey-belt label and performance against purposes A, B and D to describe the site as of “relatively unconstrained nature” but does not provide a parcel-specific explanation of how this open farmland is judged not to strongly contribute to those purposes, nor a clear exceptional-circumstances narrative for releasing it rather than exploring fewer sensitive alternatives.

Grey-belt status indicates where Green Belt release *might* be less harmful; it does not in itself demonstrate that releasing this land is necessary or that the loss of openness is acceptable in the context of the Plan’s overall strategy.

Landscape sensitivity and settlement edge

The site is recorded as 100% medium–high landscape sensitivity. Yet the conclusions simply say this “will require further consideration” and still present the site as suitable and relatively unconstrained. There is no landscape or visual analysis demonstrating:

- How 75 dwellings would appear in views along Lingfield Road and from the agricultural land to the north and west.
- How the new built edge would relate to existing ribbon development, and whether it would read as a substantial northern extension of the town or as a contained infill.
- What structural planting, open space and boundary treatments are needed to maintain a defensible edge and a feeling of openness towards the wider countryside.

For a medium–high sensitivity Green Belt site, this lack of design- and landscape-led testing at the allocation stage weakens the justification for the assumed capacity.

Capacity, density, and design-led testing

The SHELAA equates the developable area with the full 2.12ha and assigns 75 dwellings, implying a gross density of about 35 dwellings per hectare. This is a moderately suburban density, but it has been derived by applying a broad density assumption to the entire field rather than from a design-led assessment.

There is no indicative layout or capacity work showing how:

- 75 homes,
- internal access roads and turning,
- on-plot and visitor parking, and
- meaningful landscape buffers and open space

will fit within the site once account is taken of the need to protect the amenity of existing neighbours and the setting of nearby listed buildings. For a Green Belt site of this scale and sensitivity, we would expect Regulation 19 allocations to be informed by proportionate, designed testing (for example, an illustrative masterplan) to demonstrate that the proposed yield is realistic and compatible with landscape, heritage, and Green Belt objectives, rather than relying solely on a generic density multiplier.

Relationship with EDEN10 and pattern of development

The SHELAA explicitly notes that EDEN11 does not directly border the urban confines but is adjacent to EDEN10, which is also considered suitable. This means:

- The perceived sustainability and contiguity of EDEN11 are dependent on EDEN10 being delivered broadly as envisaged.
- If EDEN10 is delayed, reduced in scale, or not taken forward, EDEN11 would amount to an isolated band of estate development behind frontage properties along Lingfield Road, protruding into open Green Belt and undermining the clarity of the town's edge.

The allocation does not address this dependency or explain how EDEN11 would be treated if EDEN10's trajectory or form changes, which raises questions about soundness and effective plan-making.

Heritage context

The site lies within 200m of two listed buildings on or near Lingfield Road. The SHELAA records their presence but does not explain how the layout, height, and design of 75 dwellings will safeguard their setting, particularly in longer views along the road and across the farmland. Heritage may not be the primary constraint, but it is a relevant material consideration that should feed into capacity and layout assumptions.

Effective and Developable (Years 6–10)

The promoter states that the land is available “now,” with anticipated commencement “by 2025”, a developer interested, and no legal constraints. The SHELAA, however, classifies the site as “developable (years 6–10)” and does not identify a completion date.

Key points:

- There is an apparent discrepancy between the promoter's ambitious commencement assumptions (by 2025) and the Council's more cautious programme (years 6–10), which is not explained.

- Site access is identified as requiring a new or additional access from Lingfield Road, yet no junction design work or capacity testing is presented to show that this can be provided safely and without harm to highway conditions.
- The statement that there are “no constraints that could render the site financially unviable at this time” is very broad and does not appear to factor in potential abnormal costs associated with access works, landscape and buffer planting, and heritage-sensitive design along Lingfield Road.

For a small but sensitive Green Belt site which is effectively tied to the delivery of a larger neighbouring allocation, this limited evidence on achievability and phasing weakens confidence in the trajectory.

Consistency with National Policy (Green Belt and Grey Belt)

The revised NPPF requires that:

- Green Belt boundaries are altered only in **exceptional circumstances**, supported by robust and transparent evidence.
- Grey-belt land is still Green Belt, and its identification does not remove the need to give substantial weight to openness and Green Belt purposes, nor to prioritise brownfield and less sensitive options.
- Development at the settlement edge is landscape- and design-led, maintaining a clear distinction between town and countryside.

In relation to EDEN11, the Plan:

- Relies on a grey-belt label and adjacency to Edenbridge (and to EDEN10) to justify a Green Belt release of open farmland with medium–high landscape sensitivity.
- Does not provide a clear, parcel-specific exceptional-circumstances narrative setting out why this land, rather than other options, must be released.
- Bases capacity on broad density assumptions without design-led testing of how 75 dwellings can be accommodated while protecting landscape character, neighbouring amenity, and the setting of nearby listed buildings.

This raises concerns about compliance with national Green Belt and design policy and the soundness tests of “justified” and “effective.”

Amenity, Access, and Local Highways

The SHELAA notes that a new/additional access is required from Lingfield Road and that there is capacity on the transport network, albeit with potential for contributions towards improvements. It does not, however, address in detail:

- How a new junction and internal road will safely connect to Lingfield Road given existing residential driveways, traffic speeds, and pedestrian movements.

- How construction and operational traffic from 75 homes will affect residents on Lingfield Road, including noise, disturbance, and parking pressures.
- The impact on the outlook and privacy of existing homes backing onto the site, which would change from open farmland to a housing estate.

These are central to the day-to-day experience of Edenbridge residents and should inform the decision to allocate the site and the quantum of development.

Cumulative Impact with EDEN10 and Other Sites

EDEN11 sits immediately alongside EDEN10 (proposed for 350 homes) on the western side of the town, and in the wider context of other Green Belt/grey-belt allocations around Edenbridge. Together, EDEN10 and EDEN11 would substantially extend the built form westwards and northwards along Lingfield Road and Crouch House Road. The Regulation 19 material does not clearly assess the combined effects on:

- Green Belt openness and the perception of sprawl to the west and north-west.
- Landscape character on the western approaches to Edenbridge; or
- Traffic and pedestrian safety on Lingfield Road when both sites are taken forward.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN10 and EDEN11

1. Overall position

The draft brief for EDEN10/EDEN11 promotes a high-density, car-accessed urban extension on a sensitive western edge of Edenbridge, without firm limits on scale, without secured education, health, transport, or utilities infrastructure, and with only generic safeguards for landscape and heritage. As drafted, it leaves too much to later negotiation and does not yet meet the Regulation 19 tests of soundness.

2. Regulation 19 Tests of Soundness

Positively Prepared

- The brief simply repeats wide “settlement-level” infrastructure needs (new secondary school, additional primary places, health capacity review, walking/cycling, and station improvements) with no clear linkage between the 425 dwellings proposed here and the delivery, timing, or funding of those projects.
- It relies on a promoted capacity (425 units) and a broad density band of 40–60 dph, rather than a tested, capped capacity consistent with the edge-of-settlement and high landscape sensitivity context.

Justified

- There is no evidence in the brief that alternative spatial options at Edenbridge, or alternative distributions of growth across the town, have been assessed in terms of landscape, heritage, and highway impact. The text assumes a “coherent expansion to the western edge” is appropriate without presenting the comparative evidence base.
- Medium-to-high landscape sensitivity is acknowledged but not translated into clear parameters on density, height, developable area, or buffers; the proposal for “higher” density towards the western edge contradicts the need to soften the settlement edge and protect the Weald landscape.

Effective

- Critical infrastructure is deferred: the brief states local sewerage and clean water capacity “to be increased” and that specific site contributions will only be defined at Regulation 19, with no commitment that upgrades must be in place before occupation,

no indication of provider agreement and no reference to capacity headroom at Edenbridge Water Treatment Works or clean water networks.

- Highways requirements are almost entirely absent: access is stated from Crouch House Road and Lingfield Road with a through-route between them, but no mention of junction improvements, traffic calming, pedestrian priority, **or how cumulative impacts with other Edenbridge allocations will be mitigated.**

Consistent with National Policy

- NPPF 2024 requires up-to-date, proportionate infrastructure evidence and clear expectations for contributions. The brief instead leans heavily on a still-evolving IDP, admits that key transport schemes are not identified yet, and pushes all specifics to a later stage.
- Heritage policy requires great weight to conservation of designated assets; yet for Skeynes Park, Crouch House and The Lodge (all Grade II) the brief relies on a future Heritage Impact Statement rather than defining non-developable areas, height restrictions, and view corridors now, at plan-making stage.

Recommendation – soundness

- Fix a **maximum capacity** for the combined site, below or at the promoted 425 units, with a lower average density reflecting edge-of-settlement character.
- Embed **pre-occupation triggers** for water, wastewater, education, health, and rail/highway schemes, tied explicitly to the IDP and provider agreements.
- Introduce clear **heritage and landscape parameters** (height limits, no-build buffers, maintained field boundaries and view corridors) rather than generic design aspirations.

3. Policy Soundness and Strategic Fit

- The brief quotes policy headings (T1/T2, H2, CC2, OS1, NE1) without explaining how this particular site helps deliver the settlement-wide strategy for Edenbridge or how it interacts with other Edenbridge allocations.
- It asserts a “coherent expansion to the western edge” and “seamless integration” with movement networks but does not demonstrate how this supports the Local Plan’s overall pattern of growth, avoids overloading a single side of the town, or respects the role of the western approach in defining Edenbridge’s rural setting.

Recommendation

- Add text demonstrating, at Regulation 19, that western expansion at EDEN10/11 is the **least harmful and most sustainable option** for accommodating this quantum of growth at Edenbridge, compared with alternatives.

4. Site-Specific Robustness

Transport and Access

- The only firm transport commitments are a through-route between Crouch House Road and Lingfield Road and new internal walking/cycling routes. There is no mention of trip generation, highway capacity, impacts on town-centre junctions or mitigation at sensitive locations along Crouch House Road and Lingfield Road.

Education and Health

- The brief lists “additional primary school places” and a “new secondary school” as wider settlement needs, and notes that Memorial Health Centre capacity is under review, but gives no indication whether EDEN10/11 is expected to contribute land and/or strategic funding.

Utilities and Drainage

- A requirement that local sewerage and clean water capacity “be increased alongside phasing of development prior to occupation of any new dwellings” is welcome but is not tied to any evidence of current headroom or to named schemes and providers; it is not stated as a pre-commencement or Grampian style condition.

Recommendation

- Require an **access and junction strategy**, informed by town-wide modelling, to be approved with the allocation and referenced in the brief.
- Specify that EDEN10/11 must make proportionate contributions towards, the Edenbridge infrastructure, in line with stated needs.
- Strengthen wording so that **no occupation** can occur until specified wastewater and clean water schemes identified in the IDP are operational, with clear reference to Southern Water and Sutton & East Surrey Water projects.

5. Impacts on Edenbridge and Local Communities

- Cumulative impacts on traffic, parking, school places, GP capacity, and station access across Edenbridge are not addressed; yet the IDP confirms pressures on education, rail, water, and wastewater, and anticipates station access improvements.
- The promise that the scheme will “reduce car dependency” is aspirational: there are no minimum standards for public transport frequency, no parking restraint policy, and no commitment that key walking/cycling links will be delivered early in the build-out.

Recommendation

- Insert a requirement for a **comprehensive Transport Assessment and Travel Plan for all Edenbridge allocations combined**, with phasing conditions to prevent early overloading of local roads and stations.

6. Sustainability and Environment

- The brief references low-carbon development and SuDS but does not mandate specific measures (e.g. net-zero ready homes, fabric standards, renewable generation, EV infrastructure, minimum BNG above the statutory 10%, long-term management of green infrastructure).
- Landscape-led design and retention of historic field patterns are positive, but there is no commitment to maintain an open rural edge to the west or to retain a meaningful green gap between Edenbridge and the wider countryside.

Recommendation

- Add explicit requirements that the scheme achieves **at least 10% BNG**, delivers **net-zero operational carbon homes in line with or ahead of Building Regulations**, and secures a **permanent landscaped buffer** and height limits along the western edge.

7. Deliverability and Practicality

- Delivery timeframe of 6–10 years is simply “as defined by the site promoter”; there is no alignment with timetables for school provision, rail improvements or utilities upgrades, contrary to NPPF expectations on infrastructure phasing.
- Developer obligations are left entirely open, with only a generic reference to CIL and S106 in the Local Plan/IDP and no indication of the relative strategic importance of contributions from this major site.

Recommendation

- Amend the brief to require an **infrastructure phasing plan** for EDEN10/11, agreed with KCC, NHS, Network Rail, and water companies, securing delivery of key projects in tandem with housing completions.

8. Legal and Procedural Vulnerabilities

- The repeated use of soft language (“will be informed by,” “should,” “will help to”) for critical safeguards – heritage, landscape, utilities, transport – creates ambiguity and scope for later dilution at application or appeal.
- Reliance on an incomplete IDP, with acknowledged gaps in Edenbridge transport schemes and only indicative statements on education and utilities, exposes the allocation to challenge as not properly justified or effective under NPPF 2024.

Recommendation

- Replace discretionary wording with **clear, enforceable requirements** and cross-references to specific, named infrastructure items in the updated IDP, to reduce scope for misinterpretation at development management and appeal.

9. Lines of objection / representation

- As drafted, the EDEN10/11 brief is **not justified or effective** for Regulation 19 because it lacks a tested capacity cap, fails to secure education, health, transport, and utilities infrastructure for Edenbridge, and does not translate known landscape and heritage sensitivities into binding parameters.
- The brief is **not consistent with national policy** on infrastructure planning, heritage, design, and climate, given its reliance on incomplete IDP work and generic design aspirations.
- We request that the Council **tighten and amend** the brief in line with the recommendations above before Regulation 19 or reconsider the scale and location of growth at this sensitive western edge of Edenbridge.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN12 – Land South West of Skinners Farm

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN12 is an 8.31ha greenfield site near the urban confines of Edenbridge. It comprises agricultural land bounded by Skinners Farm to the east, Skinners Lane to the north, allotments to the south, and further farmland to the east, south and west. The land lies wholly within the Green Belt and is classified by the Council as “grey belt” in its Green Belt assessment. It is recorded as 80% medium and 20% medium–high landscape sensitivity, with Grade 3 agricultural land across the site. Approximately 38.5% of the land is within Flood Zone 2 and 0.52% within Flood Zone 3. The SHELAA treats the full 8.31ha as developable, proposes a yield of 155 dwellings, concludes the site is “developable (years 6–10)” and the Plan allocates it for 155 homes as a greenfield extension to the consented scheme south of Skinners Lane (20/02998/OUT).

Crucially, this land formed part of a wider strategic site recently the subject of outline application 24/02765/OUT for 450 homes, a primary school and community facilities. That application sought to increase an already consented 340-home scheme to 450 units by adding an extension of about 9.1ha to the south-east, adjacent to the allotments, essentially the area now shown as EDEN12 now, for an extra 110 dwellings on top of the 340 already permitted. The Local Plan allocation now proposes 155 dwellings on this extension land alone, i.e. a higher quantum of housing than was recently refused on the same parcel.

The Council’s own officer report for 24/02765/OUT recommended refusal on Green Belt, density and infrastructure grounds, explicitly stating that the wider site **is not grey belt** and that the proposal **failed to meet the NPPF’s new Green Belt “Golden Rules”** and efficient-use-of-land requirements. On this basis the application was withdrawn. In this context, the decision to re-present part of the refused “extra land” as a standalone allocation for 155 homes raises serious questions about Green Belt consistency, capacity, density and deliverability against the Regulation 19 Tests of Soundness.

Positively Prepared

The SHELAA notes that EDEN12 lies within the buffer of the urban confines of Edenbridge, that over half of the site is within 400m of the town, that it is within 2km of the central area and within 800m of Edenbridge Town station. These are favourable accessibility factors, and the allocation

emphasises that EDEN12 is a “logical” extension to the consented scheme south of Skinners Lane.

A positively prepared plan must, however, also **reflect the recent planning history**. The Committee report for 24/02765/OUT concludes that the wider site (including the EDEN12 land) **lies in the Metropolitan Green Belt, is not grey belt**, and that expanding from 340 to 450 homes would cause significant harm to openness and fail the NPPF “Golden Rules” on Green Belt, including the requirement for very special circumstances and for at least 50% affordable housing in an enforceable legal agreement. The Draft Local Plan now relies on the same extension land, for an even higher number of homes (155 instead of the 110 previously sought there), **but does not explain why those recent conclusions can be set aside**. That omission calls into question whether the allocation is genuinely positively prepared.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt status, grey-belt classification and conflict with the officer report

The EDEN12 SHELAA entry states that the site lies wholly within the Green Belt and is classified as “grey belt”, and then uses that label, together with adjacency to a consented scheme and a “sustainable location”, to describe the land as a logical, contained extension suitable for development.

By contrast, the officer’s Committee report on 24/02765/OUT for the wider 450-home scheme, which includes this land now on EDEN12, is clear that:

- The site lies within the Metropolitan Green Belt where strict restraint applies.
- The land is not considered grey belt and does not meet the relevant NPPF paragraphs on that concept.
- The enlarged scheme would be inappropriate development, causing significant harm to Green Belt openness that is not outweighed by very special circumstances.

The Committee report on application 24/02765/OUT has already assessed this wider site, including the EDEN12 land, and recommended refusal on Green Belt, density and infrastructure grounds, concluding that the land is not grey belt and that major development here would cause significant harm to openness which is not outweighed by very special circumstances. The new SHELAA entry and Regulation 19 allocation now classify this same extension land as “grey belt”, treat the whole 8.31ha as developable, and propose 155 dwellings on it, **without explaining how this directly contradictory position has been reached so soon after the Council’s own detailed appraisal of the site** through the 24/02765/OUT application.

This unresolved inconsistency goes directly to soundness: a plan must be clearly based on a robust and up-to-date evidence base, not on a classification that the authority itself has recently rejected when tested through an application.

Landscape sensitivity and settlement edge

The site is recorded as 80% medium and 20% medium–high landscape sensitivity. The SHELAA acknowledges this but simply notes that sensitivity “would need further consideration,” while still treating the entire parcel as developable and suitable. There is no published landscape or visual assessment showing:

- How 155 dwellings would appear from Skinners Lane, Skinners Farm, the allotments and countryside to the south and west.
- How the development would read alongside the consented scheme — as a coherent long-term edge or as a large, exposed spur of estate housing into the Green Belt.
- What structural planting, open space and boundary treatments are required, particularly along the southern and western edges, to mitigate visual impact and maintain some perception of openness.

The Committee report on 24/02765/OUT accepts that the wider site is visually related to Edenbridge but still finds significant harm to openness in both visual and spatial terms due to the scale and spread of development. Those concerns plainly apply to the extension area now allocated as EDEN12 but are not addressed in the SHELAA summary.

Flood risk and the extent of “developable” land

The SHELAA records that 38.5% of EDEN12 lies in Flood Zone 2 and 0.52% in Flood Zone 3, yet it treats the whole 8.31ha as developable and does not adjust the developable area to reflect land that must remain undeveloped, accommodate attenuation or function as open space. The percentages clearly come from mapping, but there is no explanation of what they mean in spatial terms on the ground or how they constrain layout.

The Committee report for 24/02765/OUT notes that, subject to layout keeping built development out of Flood Zones 2 and 3 and to appropriate drainage measures, flood risk could be managed, and the Environment Agency and LLFA did not object subject to conditions. That confirms large parts of the floodplain must be kept undeveloped and used for open space, attenuation and ecological mitigation. For EDEN12, this should be reflected in a reduced developable area and carefully calibrated capacity, not in a blanket assumption that all 8.31ha are developable.

Capacity, density and the refused “uplift”

The SHELAA applies the 155-home figure across the full 8.31ha, implying a low gross density of about 18–19 dwellings per hectare. On the face of it this appears modest, but in practice:

- Once floodplain, odour buffers (if any), drainage features, landscape buffers, minerals safeguarding and access land are taken out, the actual residential area will be noticeably smaller, and the net density substantially higher than the headline figure.
- The Committee report for 24/02765/OUT criticises the enlarged 450-home scheme for failing to make efficient use of land at about 29dph overall, and for not increasing density appropriately in the more sustainable parts of the site, despite seeking an uplift from 340 to 450 units.

On the extension land, the refused application was effectively seeking an extra 110 homes on top of the consented 340 by enlarging the site into this EDEN12 area. The Local Plan now proposes 155 dwellings on that same extension parcel alone, more housing on this Green Belt strip than the uplift that was refused in 24/02765/OUT.

Despite this, there is no design-led capacity testing (such as indicative layouts or masterplanning) in the EDEN12 evidence to show how 155 homes, roads, parking, open space, attenuation and buffers can be accommodated on the extension land while responding to the

Green Belt, floodplain and landscape sensitivities highlighted in the Committee report. For a site drawn directly from a recently refused enlargement, this absence of explicit design-led work is a significant gap.

Transport network capacity and access

The EDEN12 SHELAA flags “no capacity on [the] transport network” and a need for “new/additional access”, both as red constraints, but then simply notes that transport and odour assessments “would need further consideration” and still concludes that the site is suitable and developable in years 6–10.

For the wider 450-unit proposal, KCC Highways accepted that, with a substantial package of mitigation, the scheme would not have a “severe” residual impact but required:

- significant bus service funding over five years.
- off-site junction improvements.
- travel plan measures and monitoring; and
- detailed conditions on access and layout.

Those requirements were tailored to the combined 340+110 arrangement and its phasing. The EDEN12 allocation, however, treats the extension land as if it were a simple 155-home bolt-on, without explaining how a different phasing or quantum on this part of the site would interact with the highway works and obligations the Committee report found necessary. For an allocation relying on a network already recorded as having “no capacity,” the lack of a site-specific access and transport strategy is a serious shortcoming.

Minerals safeguarding and contamination

The SHELAA notes that 38.44% of EDEN12 lies within a Minerals Safeguarding Area and that contaminated land assessment is required. The conclusions do not explain whether safeguarding policy will require prior extraction, whether that is compatible with flood risk and green infrastructure proposals, or what costs and delays might arise from investigation and remediation. These are relevant both to capacity and to effective, timely delivery.

Effective and Developable (Years 6–10)

The promoter information recorded in the SHELAA indicates that the wider site is “available now,” with anticipated commencement and completion between 2026 and 2030, a developer interested and no legal constraints, and it concludes there are “no constraints that could render the site financially unviable at this time”.

The Committee report on application 24/02765/OUT has already assessed this wider site and recommended refusal of the enlarged 450-home scheme on Green Belt, density and infrastructure grounds, including the failure to secure the full “Golden Rules” package of 50% affordable housing and infrastructure, and that application has since been withdrawn. **In that context, simply repeating that there are no constraints that could render the EDEN12 land unviable is not convincing.** A strategic Green Belt allocation that requires substantial highways, drainage, biodiversity, school and community infrastructure clearly raises viability and delivery risks, and the loss of the previous application underlines those uncertainties.

For EDEN12 specifically, the Plan provides no updated deliverability analysis to show that Cooper Estates, as landowner and previous promoter of the refused 450-home scheme, will be able to bring forward 155 homes on this extension parcel within years 6–10, alongside and in coordination with the already complex obligations associated with the consented 340-home scheme.

Consistency with National Policy (Green Belt and Flood Risk)

National policy requires that:

- Green Belt boundaries are altered only in exceptional circumstances, supported by robust, transparent evidence.
- Grey-belt land remains Green Belt, with openness and Green Belt purposes given substantial weight, and does not automatically become suitable for estate-style development.
- A risk-based, sequential approach is taken to flood risk, steering more vulnerable uses away from higher-risk areas and justifying any development in Flood Zones 2 and 3 based on evidence and mitigation.
- Plans are underpinned by proportionate evidence on transport capacity, density and viability, particularly where recent decisions have tested the same land through applications.

In relation to EDEN12, the Plan:

- Relies on a grey-belt label and adjacency to a consented scheme to justify releasing an 8.31ha Green Belt extension, despite the Committee report finding that the wider land is not grey belt and that an uplift into this extension area is inappropriate and harmful to openness.
- Counts all 8.31ha as developable despite substantial Flood Zone 2 coverage, with only high-level acknowledgement of flood risk.
- Bases capacity on a broad density applied to the whole parcel, for 155 dwellings, more than the 110-home uplift sought and refused on the same extension land, without design-led testing.
- Offers only generic statements on highways and viability, even though the larger 450-home scheme has very recently exposed the complexity of mitigation and obligations needed in this location.

Taken together, this raises serious concerns about consistency with national Green Belt, grey-belt and flood-risk policy, and with the soundness tests of “justified” and “effective.”

Amenity, Access and Local Highways

For residents using Skinners Lane, the adjacent consented site and the allotments, adding 155 homes on the extension parcel would have clear day-to-day impacts that are not assessed in detail. The evidence does not address:

- Where safe access points to Skinners Lane would be located, given existing traffic and the “no capacity” notation.

- How additional traffic from 155 dwellings would affect congestion, safety and walking routes between the site, the consented scheme and the town centre.
- The relationship between new housing and the allotments and Skinners Farm in terms of privacy, overlooking, boundary treatments, noise and any existing agricultural odours.

These are central to how the development would function in practice and to local residents' experience, yet they are largely left to future application-stage consideration.

Cumulative Impact on Edenbridge

EDEN12 sits immediately alongside the consented 340-home scheme south of Skinners Lane and in the wider context of several Green Belt/grey-belt releases around Edenbridge. Together, these sites would extend built development significantly north and east, altering the town's relationship with its countryside setting and adding substantial pressure to local roads and services.

The Regulation 19 material does not clearly assess the combined effect of bringing forward EDEN12 alongside the consented scheme and other allocations on:

- Green Belt openness and perceptions of sprawl in this part of Edenbridge.
- Landscape character and public views across the valley and towards the town; and
- Traffic and accessibility on Skinners Lane and other local routes that already face capacity constraints.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN12

Preliminary procedural objection – mislabelling and access to the brief

There has been clear confusion and a lack of transparency around this site's development brief. A document labelled "EDEN12" was initially published on the consultation portal, but it was in fact the brief for EDEN9 (Land north of Skinners Lane). This was later corrected on the Evidence Base so that the EDEN9 brief appeared under the correct reference. However, no separate development brief for the actual EDEN12 site (Land south west of Skinners Farm) was ever added to the Evidence Base.

As a result, the existence of a development brief for EDEN12 was not apparent to the public in the main documentation and only became visible when attempting to comment on the site. However, when downloading this the brief says it is EDEN12, but the content and map are showing EDEN9. This is procedurally unacceptable, risks misleading respondents, and undermines the fairness and legal adequacy of the consultation.

Additional concern: selective treatment of planning history on this site

The land now promoted as EDEN12 has very recently been the subject of outline application 24/02765/OUT for 450 dwellings, secondary school land, a station car park, and associated community uses. Of those 450 dwellings, 340 already benefited from outline permission under 20/02988/OUT; the application was, in substance, an attempt to add a further 110 dwellings on top of the existing consented scheme. The application was recommended for refusal on the basis of Green Belt harm, inefficient use of land and inadequate infrastructure and affordable housing provision and was subsequently withdrawn by the developer.

Inexplicably, all public comments submitted on 24/02765/OUT have since been removed from the Council's website. This erases a recent and highly relevant record of local concerns and expert representations about the scale, form and impacts of development on this land. The subsequent promotion of EDEN12 in the Local Plan for 150 additional homes appears to reintroduce and even increase the uplift (from 110 to 150 dwellings) that was being sought through 24/02765/OUT, but now through the plan-making route rather than a planning application, and without properly acknowledging or engaging with that recent history.

At the same time, the SHELAA and related evidence refer only to the neighbouring outline permission 20/02988/OUT and do not clearly set out the full context of 24/02765/OUT, its scale, its recommended refusal and withdrawal, nor the fact that a larger uplift is now being pursued via EDEN12. This selective treatment of planning history gives a partial and overly favourable picture of the site's prospects, downplays the Council's own recent conclusions on Green Belt

and infrastructure harm, and undermines confidence that the evidence base is full, fair, and transparent.

For the Local Plan to be found sound, the SHELAA and all site-specific evidence must be corrected to:

- explicitly record 24/02765/OUT, the relationship between the 450 dwellings, the existing 340-dwelling permission and the additional 110 units.
- explain why public comments on that application have been removed from public view; and
- justify clearly why a still larger uplift of 150 dwellings is now considered acceptable through EDEN12, in light of the earlier professional assessment and local objections.
- Without this, the handling of EDEN12 and its planning history remains open to serious challenge on transparency, fairness, and the robustness of the Local Plan evidence base.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN13 – Land west of Lingfield Road Recreation Ground and east of Skeynes Farm Cottages

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN13 is a 3.19ha greenfield site on the western edge of Edenbridge. It forms part of an agricultural holding, bounded by Lingfield Road and the recreation ground to the north, existing housing to the east and west (including Skeynes Farm Cottages), and open countryside to the south. The land is flat, with a mature hedgerow along Lingfield Road. It lies wholly within the Green Belt, is classified by the Council as “grey belt,” has predominantly medium landscape sensitivity (with a small element of medium–high) and falls partly within a Minerals Safeguarding Area (River Terrace Deposits). The SHELAA treats the whole 3.19ha as developable, proposes 70 new-build dwellings, concludes the site is “suitable” and “developable (6–10 years)”, and the Plan allocates it for 70 homes.

We acknowledge that the land is adjacent to the settlement and close to services compared with more remote locations. However, the way Green Belt / grey-belt status, landscape sensitivity, minerals safeguarding, access from Lingfield Road, density and deliverability assumptions are handled is incomplete. In our view, the allocation is not yet clearly “justified” or “effective” under the Regulation 19 Tests of Soundness.

Positively Prepared

The SHELAA notes that EDEN13 is adjacent to the Edenbridge urban confines, within 400m of the town, within 800m of the central and southern areas, and within 2km of Edenbridge Town station. These are positive accessibility factors.

A positively prepared plan must also recognise that this is currently open farmland forming part of the rural setting of Lingfield Road and the recreation ground, lying wholly in the Green Belt and partly in a Minerals Safeguarding Area. The site description itself says the land is in agricultural use, yet the assessment table lists “no existing use” and categorises 39.41% of the land as “Urban” in agricultural land quality, without explanation. This internal inconsistency makes it harder to see how the Plan has formed a clear picture of the site’s present character and role in the Green Belt.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and grey-belt status

The site is wholly within the Green Belt and is described as grey belt under the Council's Stage 3 Green Belt work, based on performance against purposes A, B and D. The SHELAA then concludes that "due to the unconstrained nature of the site" and its sustainable location, it is suitable for development.

Whatever internal label is applied, the land clearly forms part of the open countryside immediately south of Lingfield Road and the recreation ground, contributing to:

- checking westward sprawl along Lingfield Road; and
- safeguarding the countryside setting south of the existing frontage housing and recreation space.

Grey-belt classification does not, in itself, amount to exceptional circumstances for altering the Green Belt boundary. For EDEN13 there is no clear, parcel-specific exceptional-circumstances narrative explaining why this particular field should be released ahead of other, less sensitive or previously developed options.

Landscape sensitivity and settlement edge

The assessment records the site as predominantly medium landscape sensitivity with a small element of medium-high sensitivity ("Medium – High (0.98%) / Medium (78.48%)"), but the figures presented are confusing and do not obviously total 100%. The conclusions simply state that landscape issues will "require further consideration" and nevertheless treat the entire 3.19ha as developable.

There is no landscape or visual analysis demonstrating:

- how 70 dwellings would appear in views from Lingfield Road, from the recreation ground and from the open countryside to the south.
- how the development would change the current transition between the town/recreation space and rural land; or
- what amount of planting, open space or set-back would be needed to create a clear, defensible long-term edge to Edenbridge.

For a Green Belt site forming the immediate backdrop to a public recreation ground, the absence of design- and landscape-led testing at allocation stage is a significant omission.

Capacity, density and potential for later intensification

The SHELAA treats the whole 3.19ha as developable and applies a straight yield of 70 dwellings, implying a gross density of roughly 22 dwellings per hectare across the entire Green Belt parcel.

On paper this appears modest, but it is achieved by spreading 70 homes over the whole field, including land that in reality will need to serve as:

- structural open space and landscape buffers (particularly towards the recreation ground and open countryside).
- space for drainage and attenuation features; and

- internal access roads and turning areas.

Once these non-residential elements are removed, the net developable area for housing will be smaller and the real residential density materially higher than the headline 22 dph. That raises two concerns:

- First, the low gross density risks **understating the true intensity of development and land-take** at Regulation 19 stage, making the Green Belt loss appear gentler than it is likely to be on the ground.
- Second, it may create **future pressure to “optimise” density** by adding more dwellings or reducing open space once the principle of releasing the whole 3.19ha has been established, on the grounds that 22 dph is “low” for an edge-of-town location.

There is no indicative layout or capacity work showing how 70 homes, roads, parking, open space, drainage and buffers can actually be fitted into a well-designed scheme that respects the recreation ground and countryside setting. The 70-dwelling figure therefore appears to be a simple density multiplier across the whole field rather than the outcome of a design-led appraisal as expected at Regulation 19.

Minerals safeguarding and contamination

The site lies within a Minerals Safeguarding Area (River Terrace Deposits) and will require contaminated land assessment due to former/farming uses. The conclusions simply note that these matters “will require further information,” without addressing:

- whether prior extraction or non-sterilisation will be required under minerals policy.
- how that might affect the developable footprint, phasing and construction impacts; or
- what potential remediation costs might mean for viability.

These are material considerations for both capacity and deliverability, yet they have not influenced the conclusions in any meaningful way.

Access and traffic on Lingfield Road

The SHELAA records that a new or additional access is required from Lingfield Road and that there is capacity on the transport network, albeit with scope for contributions. It does not, however, provide a site-specific highways assessment showing:

- where a safe junction could be formed on Lingfield Road, taking account of existing residential accesses and the entrance to the recreation ground.
- how visibility, pedestrian safety and crossing opportunities for children and families using the recreation ground will be protected; or
- how traffic from 70 homes would interact with cumulative growth from other allocations to the west and north of the town.

Residents have observed that a tarmacked junction/bell-mouth has already been opened up onto Lingfield Road at this location in advance of the Local Plan being adopted. That real-world activity is not reflected in the SHELAA text (which still describes a new access as a future requirement) and gives the impression that the site is being physically prepared for development before the principle of allocation has been examined through the plan process.

This underlines the need for transparent, robust highways evidence at plan stage rather than leaving these issues entirely to a later application.

Effective and Developable (Years 6–10)

The promoter information in the SHELAA states that the land is “available now,” with commencement “by 2025” and a phased completion programme running 2024–2028, and that there is currently no developer on board, with Green Belt status said to be “the only barrier to developer purchase”. The Council, meanwhile, classifies the site as “developable (6–10 years)”.

As of December 2025, those promoter dates are already out of date:

- The SHELAA timetable assumes homes could be under construction and even completing between 2024 and 2028, yet no permission is in place and the Plan itself has not yet been adopted.
- The allocation provides no updated evidence on whether a developer has now taken an interest, or how the costs of access works, minerals safeguarding, potential remediation, drainage and landscape buffers will affect viability.

The assertion that there are “no constraints that could render the site financially unviable at this time” is therefore a broad, unattributed judgement rather than the product of current, site-specific testing. For a Green Belt allocation of this type, on a site with acknowledged minerals issues, contamination, access works and landscape sensitivity, the evidence base on deliverability and timing is weak and already out of date.

Consistency with National Policy (Green Belt and Design)

National policy expects that:

- Green Belt boundaries are altered only in exceptional circumstances, supported by robust, transparent evidence.
- Even where land is described as grey belt, it remains Green Belt and openness and Green Belt purposes must still be given substantial weight, with brownfield and less sensitive land considered first.
- Development at settlement edges is landscape- and design-led, creating clear, defensible boundaries between town and countryside and protecting the role of recreation spaces.
- Allocations are based on realistic, up-to-date assumptions about timing and deliverability.

In the case of EDEN13, the Plan:

- Relies on a grey-belt label and adjacency to a “top tier settlement” to justify releasing a field that currently provides the immediate rural setting to Lingfield Road recreation ground.

- Provides no parcel-specific exceptional-circumstances narrative or design-led masterplanning to support the 70-dwelling figure.
- Uses a low gross density across the entire Green Belt parcel, which risks understating the real intensity of development and future pressure for higher numbers.
- Bases delivery assumptions on a timetable that has already passed, without updating promoter information or viability analysis.

This raises serious questions about whether the allocation is “justified” and “effective” in terms of the updated national policy framework.

Amenity, Recreation and Local Character

The recreation ground and play area on Lingfield Road are heavily used community facilities. Allocating EDEN13 for housing would:

- replace the current open-field backdrop to the pitches and play area with a line of estate housing and garden boundaries.
- increase traffic movements and turning manoeuvres on Lingfield Road directly adjacent to the recreation ground entrance; and
- alter the sense of separation between public recreation space and private back gardens.

The SHELAA conclusions do not examine these day-to-day amenity and safety impacts for people using the recreation ground, despite them being central to how the development would be experienced by local residents.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN14 – Land at Breezehurst Farm

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN14 is a 17.93ha mixed greenfield/previously developed site at Breezehurst Farm, on the western edge of Edenbridge. It comprises a small industrial park with workshops in the north-west corner and extensive agricultural fields used for grazing, divided by trees and hedgerows. The land lies entirely within the Green Belt, is classified as “grey belt” in the Council’s assessment and is recorded as almost entirely medium–high landscape sensitivity (99.92%). It is bounded by railway lines to the north and south, Crouch House Road and residential areas to the west, and existing housing to the east. Flood Zones 2 and 3 run east–west through the centre of the site. Access is described as “difficult” and the surrounding road network as having “limited capacity” requiring improvements. The SHELAA treats the full 17.93ha as developable, proposes 450 dwellings plus 1.4ha of employment land, community uses and open space/allotments, and concludes the site is “developable (6–10 years)” and should be included in the Plan.

We understand the objective of locating some mixed-use growth close to an existing town with rail access. However, we consider that Green Belt/grey-belt policy, flood risk, landscape sensitivity, access and transport capacity, and the realism of the trajectory for such a large, complex site have not been robustly addressed. In our view, this allocation does not clearly meet the Regulation 19 Tests of Soundness, particularly “justified” and “effective”.

Positively Prepared

The SHELAA notes that EDEN14 is adjacent to the urban confines of Edenbridge, within 400m of the town, within 2km of the central, northern and southern town centres, and within 2km of both stations. These are positive accessibility features in strategic terms.

A positively prepared plan must also weigh the role of this land as a substantial tract of Green Belt farmland forming the western approach to Edenbridge, almost entirely of medium–high landscape sensitivity and sandwiched between two railway lines. The site includes an existing industrial park which is proposed to be “re-provided,” but it is not clear where or how that employment use will be relocated or integrated. The allocation also anticipates significant new access infrastructure and off-site highway works, yet there is no transparent explanation at plan stage of how this will be delivered or phased alongside housing, employment, community uses and open space.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and grey-belt status

The SHELAA confirms the site lies fully within the Green Belt and has been recommended for release through the Stage 2 Green Belt assessment, being classified as “grey belt under national policy”. Under the revised NPPF, grey belt is defined as Green Belt land comprising previously developed land and/or other land which does not strongly contribute to certain Green Belt purposes, and it expressly excludes land where the application of policies relating to the assets in footnote 7 (including some areas at risk of flooding) would provide a strong reason for refusing or restricting development.

In this case:

- Only a small portion of the site is previously developed (the industrial park); the majority is open grazing land.
- The fields sit between the built edge of Edenbridge and countryside to the west, clearly helping to check westward sprawl and safeguard the countryside from encroachment.
- Flood Zones 2 and 3 run across the centre of the site from east to west, which may bring parts of the land within the “areas at risk of flooding” excluded from grey-belt status.

Despite this, the entire 17.93ha parcel is treated as grey belt and as a “logical extension” to the town on the basis of being enclosed by “hard boundaries”. There is no accessible, parcel-specific explanation of how the largely greenfield countryside element has been judged not to strongly contribute to relevant Green Belt purposes, nor how the grey-belt exclusion for flood-risk land has been considered. That is a serious gap in the justification for releasing such a large Green Belt site.

Landscape sensitivity and settlement form

The site is recorded as almost wholly medium-high landscape sensitivity (99.92%). Yet the conclusions simply say that this “will need consideration” and then go on to describe the site as suitable and enclosed by “hard boundaries.” There is no published landscape or visual assessment demonstrating:

- How 450 dwellings plus 1.4ha of employment land, community uses and open space would appear in views from Crouch House Road, from Hilders Lane, from the railway lines and from countryside to the west.
- Whether the development would create a coherent and defensible new western edge or read as a large, visually prominent block of urbanisation between the railways.
- What scale of structural planting and open space would be required to mitigate visual and noise impacts at the settlement edge.

For a high-sensitivity Green Belt site of nearly 18ha, this lack of landscape- and design-led testing at allocation stage undermines the claim that the site is simply a “logical extension”.

Flood risk and the “developable” area

The SHELAA records that 2.24% of the site falls within Flood Zone 2 and 9.36% within Flood Zone 3. These figures are clearly the product of a GIS overlay using current Environment Agency

mapping rather than a site-specific survey. They do not necessarily reflect the lived reality of how water actually behaves on the ground across this large, low-lying site, nor do they anticipate how updated flood data and climate change allowances may alter the extent and depth of flood risk over the plan period.

At Regulation 19 stage, the updated SFRA should now be available and should already have been used to refine:

- the true extent of land that can be built on.
- the land that must be safeguarded as open space, flood storage and attenuation; and
- the suitability of placing a large mixed-use allocation over a flood corridor running through the middle of the site.

Relying on a broad yield across the full site, while deferring detailed flood considerations to an updated SFRA that has not been reflected in the capacity assumptions, is not a robust basis for allocation.

Capacity, density and mixed-use structure

The SHELAA assumes 450 dwellings plus 1.4ha of employment land and community uses across the full 17.93ha developable area. On a simple calculation, that equates to around 25 dwellings per hectare if spread evenly across the entire parcel. However:

- A substantial proportion of the site must be reserved for employment, community uses, open space, allotments and the east–west flood corridor.
- Once those non-residential elements are removed, the net housing area will be significantly smaller and the true residential density correspondingly higher than the headline figure.
- There is no indicative masterplan showing how 450 homes, 1.4ha of employment land, community facilities, flood storage, open space and access roads would be arranged, nor how potential conflicts (for example, noise and traffic from employment uses near existing housing) would be managed.

The capacity appears to have been generated by applying a headline yield to the whole parcel, rather than by design-led testing that demonstrates the mixed-use scheme can function well on the ground without over-intensifying the remaining developable land.

Access, “difficult” site entry and limited network capacity

The SHELAA explicitly flags site access as “difficult” and notes “limited capacity on [the] transport network [which] requires improvements.” Those are major constraints for a 450-home, mixed-use scheme. Yet the conclusions merely state that a new access and emergency access will be required and that road capacity “will need further consideration,” while still treating the site as straightforwardly developable in years 6–10.

No site-specific highways work is presented showing:

- Where main and emergency vehicular access points would be located on Crouch House Road or other streets.

- How additional traffic from 450 dwellings and 1.4ha of employment land would be accommodated on a network already described as having limited capacity; or
- How safe walking and cycling connections would be provided between the site, schools, the town centre and the stations, given the barriers presented by the railway lines.

Without this, it is not possible to conclude that access and network capacity issues can be satisfactorily resolved, or to understand the scale and cost of the mitigation that would be required.

Existing industrial use and re-provision

The site includes a small industrial park containing workshops at the north-west corner. The assessment says that the existing use “will be re-provided” but does not say whether this will be relocated on-site within the 1.4ha of new employment land, or elsewhere in the town. There is no evidence on:

- How continuity of local employment will be maintained.
- Whether the re-provision will increase or reduce floorspace and job numbers; or
- What transitional impacts there may be for existing businesses if redevelopment proceeds in phases.

This lack of clarity is notable for a site promoted as a mixed-use allocation that is partly justified by the delivery of new employment.

Effective and Developable (Years 6–10)

The promoter (Dwyer Engineering Services Ltd) indicates that the site is available “by 2025”, with commencement also “by 2025” and completion at 50 units per year over 11 years. The Council, however, categorises the site as “developable (6–10 years)” and allocates it accordingly.

Key issues:

- As of late 2025, the assumed start date (“by 2025”) has already passed, yet no permission is in place, and the Local Plan is not yet adopted. The promoter’s build-out programme (50 homes a year for 11 years) could not realistically be contained within a single 6–10 year window even if it started immediately.
- Delivery of 450 homes plus employment, community uses and significant infrastructure between years 6 and 10 of the plan period would require a high degree of certainty over access, flood mitigation, land assembly, phasing and viability that is not evidenced at this stage.
- The statement that there are “no constraints that could render the site financially unviable at this time” is a broad assertion which does not appear to factor in the costs of new and emergency accesses, off-site highway works, flood risk mitigation, noise attenuation (rail and commercial), relocation of existing employment use and provision of community facilities.

For a strategic Green Belt/mixed-use allocation of this scale, on a site with acknowledged difficulties of access and medium-high landscape sensitivity, the deliverability evidence is therefore limited and already somewhat out of date.

Consistency with National Policy (Green Belt, Grey Belt and Flood Risk)

The revised NPPF requires that:

- Green Belt boundaries are altered only in exceptional circumstances, supported by robust, transparent evidence.
- Grey-belt land is still Green Belt, and its identification does not remove the need to give substantial weight to openness and Green Belt purposes, nor to apply the exclusions in footnote 7 (including some flood-risk areas).
- Development in areas at risk of flooding follows a sequential, risk-based approach, steering more vulnerable uses such as housing away from Flood Zones 2 and 3 wherever possible; and
- Strategic allocations are underpinned by proportionate evidence on design, landscape, transport and viability.

For EDEN14, the Plan:

- Relies heavily on the grey-belt label and the presence of “hard boundaries” (railway lines and existing development) to justify releasing the entire 17.93ha, despite the site being almost wholly greenfield, of high landscape sensitivity and traversed by Flood Zones 2 and 3.
- Counts the full site as developable while deferring detailed consideration of the flood corridor to a future SFRA update, rather than reflecting it in the allocation’s developable area and capacity.
- Uses a headline yield derived from density assumptions rather than design-led masterplanning; and
- Offers only high-level commentary on access and network capacity, despite the site being flagged as having “difficult” access and limited road capacity.

This raises serious questions about whether the allocation complies with national policy and can be regarded as “justified” and “effective” for Regulation 19 purposes.

Amenity, Access and Local Highways

For residents on Crouch House Road, Hilders Lane and the adjoining neighbourhoods, a mixed-use scheme of 450 homes and 1.4ha of employment land would have significant day-to-day impacts:

- Traffic from a development of this scale, combined with employment traffic and servicing, would add substantially to movements on local roads that are already recorded as having limited capacity.

- Construction traffic for such a large site sandwiched between two rail lines would be prolonged and intensive.
- Noise from rail lines and employment uses would require careful mitigation, affecting layout, building heights and open-space quality.

None of this is properly explored in the SHELAA conclusions, which simply state that access is “difficult” and that network capacity and noise “require assessment” at a later stage. For a strategic allocation, this is not sufficient.

Cumulative Impact on Edenbridge

EDEN14 sits close to other significant allocations around Crouch House Road and Lingfield Road. Taken together, those allocations would:

- push the built form of Edenbridge westwards and northwards.
- substantially increase traffic on the western approach roads; and
- change the character of the town’s relationship with the countryside and the railway corridors.

The EDEN14 assessment does not transparently consider this cumulative picture. Instead, it assesses the site largely in isolation, despite its size and central role in the overall growth strategy for Edenbridge.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response - Sites

Development Brief – EDEN14

1. Overall conclusion

The EDEN14 development brief for Land at Breezehurst Farm is not yet sound. It relies on generic, non-committal language, underplays Green Belt and landscape harm, is weak on transport and flood risk, and leaves critical Edenbridge-wide infrastructure as an undefined “wider settlement” issue rather than as enforceable requirements for this large, sensitive Green Belt site.

2. Regulation 19 Tests of Soundness

Positively Prepared

- The brief proposes approx. 450 dwellings at 40–60 dph plus 1.4ha employment on a Green Belt edge site with a central floodplain, medium-to-high landscape sensitivity, constrained access and existing infrastructure stress. There is no clear demonstration that this quantum is the right one for Edenbridge in capacity, character or infrastructure terms.
- Education, health, transport, water and wastewater are listed only as “wider settlement infrastructure requirements” with no indication of how EDEN14 contributes, how much land or funding is needed, or any trigger points. This falls short of a positive, integrated strategy for meeting needs.

Justified

- Green Belt: the brief explicitly notes that the site is a large Green Belt parcel with medium–high landscape sensitivity, but contains no Green Belt harm analysis, no indication that all reasonable alternatives have been assessed, and no clear explanation of why this particular release and this scale are justified in Edenbridge.
- Density and capacity appear driven by a numeric target (450 units) rather than evidence on developable area (once floodplain and constraints are excluded), local character or infrastructure capacity. A 40–60 dph range on an edge-of-settlement Green Belt site with a central flood zone “park” implies very intense development on the remaining land, with no evidence that this respects Edenbridge’s character or delivers the mix indicated in the Targeted Review of Local Housing Needs.

- **Employment:** 1.4ha of unspecified “employment land” is proposed, but the brief does not define likely uses, traffic generation, hours, or amenity mitigation next to housing. This is not robust enough for examination.

Effective

- Access and movement depend on upgrading Crouch House Road, yet the brief only asks to “upgrade” and “explore the possibility” of continuous pavements and a signalised crossing. This language is aspirational, not enforceable; without secured design, land and funding, safe access for 450 homes is not demonstrated.
- Critical off-site infrastructure (schools, station upgrades, sewerage, water capacity) is pushed into a future IDP iteration and future transport modelling, with no phasing or funding strategy. This undermines deliverability over the plan period.
- The 6–10 year delivery timeframe is simply that of the promoter, with no testing against the lead-in times for secondary school provision, network rail works or utility reinforcement.

Consistent with National Policy

- **Green Belt:** the brief treats this as a standard edge-of-town allocation, not as inappropriate development in the Green Belt where “very special circumstances” and minimisation of harm must be demonstrated. It does not show how built form, density and layout minimise Green Belt and landscape harm, or how compensatory improvements will be secured, as required by national policy.
- **Flood risk:** the central floodplain is rebadged as a “defining east–west linear park”, but there is no clear commitment to exclude vulnerable uses from Flood Zone 3, no reference to climate change allowances, safe access/egress or sequential/exception tests in line with national policy.
- **Design policies** are heavily emphasised (National Design Guide, design codes, etc.), but the brief does not clearly secure key national requirements on climate resilience, infrastructure-first planning, or the alignment of growth with water and wastewater capacity.

3. Site-Specific Robustness and Infrastructure

- **Transport and access:** Crouch House Road is acknowledged as “narrow and constrained; requiring upgrades for safe pedestrian, cycle and vehicular access”, yet no specific junction schemes, widths, visibility splays, or bus service enhancements are set out.
- **Stations and active travel:** the brief requires links to both Edenbridge stations and refers to LCWIP improvements (not available at time of Regulation 18 consultation for Edenbridge), but again only generically, no firm obligation to deliver particular sections, crossings or station forecourt works, nor any indication of proportional contributions from EDEN14.
- **Education and health:** there is recognition of the need for additional primary places and a new secondary school, and that Memorial Health Centre capacity is “under

review”, but no requirement for land reservation, financial contributions or occupancy caps until school/health provision is secured.

- **Utilities:** the brief notes that sewerage and clean water capacity must be increased and that this should be phased with development but offers no evidence that providers can accommodate 450 homes on this site alongside other Edenbridge allocations, and no clear “no occupation until...” wording.

Overall, the brief reads as a design-led document with infrastructure as an afterthought.

4. Impacts on Edenbridge and Local Communities

- The brief treats infrastructure “at the wider settlement level”, making it **impossible for residents or an Inspector to see how EDEN14, in combination with other Edenbridge sites, impacts traffic, school rolls, GP capacity, water and sewage networks and rail stations.**
- The movement framework focuses on internal legibility and a central park, not on the reality of extra car trips through constrained junctions, rail underpasses and the town centre. No reference is made to cumulative impacts with the Bellway site to the east and other Edenbridge allocations.
- Requiring a “high percentage of affordable homes” is ambiguous and could generate expectations without any viability testing or clarity as to what “high” means, putting delivery and community trust at risk.

5. Sustainability and Environment

- The brief contains strong aspirational language on SuDS, green/blue networks, energy hierarchy, low-carbon materials and long-term management. However, these are not tied to measurable standards (e.g. specific fabric efficiency, on-site renewable targets, biodiversity net gain percentages beyond national minimum).
- The central floodplain “park” is doing too many jobs at once: flood storage, key amenity space, SuDS corridor, biodiversity area and visual softening of a high-density layout. There is no evidence that all these functions can be delivered to a high standard while maintaining adequate flood resilience.

6. Legal and Procedural Vulnerabilities

- **Vague wording** such as “explore the possibility”, “where possible”, “may be suitable”, “high percentage of affordable homes” and “employment uses must be carefully designed” creates scope for later dilution at application stage and weakens the brief as a material consideration.
- **Green Belt and flood risk:** absent or superficial treatment of these issues risks inconsistency with national policy and opens the door to legal challenge at examination or on individual applications.

- **Infrastructure dependence** on future IDP updates and unspecified provider agreements, without tying EDEN14 to specific obligations, undermines the brief’s usefulness in controlling later schemes and could be seen as failing the “effective” and “justified” tests.

7. Recommended changes and suggested wording

To move towards soundness the brief should be amended to:

1. Re-base capacity and density on constraints and character

- Insert wording tying any final capacity to “a detailed assessment of developable area excluding Flood Zone 3, Green Belt and landscape harm minimisation, local character, and proven infrastructure capacity”, and confirming that the 450 units is a maximum, not an entitlement.

2. Strengthen and make infrastructure requirements site-specific and enforceable

- Convert settlement-wide bullets into EDEN14 obligations, e.g.:
 “No more than [X] dwellings shall be occupied until firm, funded proposals for the new secondary school serving Edenbridge, and any necessary primary expansions, are secured through a Section 106 agreement or equivalent mechanism.”
 “No dwelling shall be occupied until Southern Water and the clean water undertaker confirm that off-site reinforcement works required to accommodate flows from the development have been completed and are operational.”

3. Require defined Crouch House Road and station access works

- Replace “explore the possibility” with:
 “Continuous, lit footways and cycle facilities shall be provided along Crouch House Road between the site access points and the wider network, together with a signal-controlled crossing south of the railway underpass, prior to first occupation.”
- Add explicit reference to contributions and physical works at both Edenbridge stations in line with the IDP.

4. Insert clear Green Belt and landscape tests

- New wording: “Development proposals must demonstrate that harm to the openness and purposes of the Green Belt and to the medium–high sensitivity landscape is minimised through layout, scale, massing and landscape treatment, and that compensatory Green Belt improvements are delivered in accordance with the Local Plan.”

5. Tighten sustainability and BNG requirements

- Require at least a specified biodiversity net gain percentage and explicit fabric and operational energy performance standards, with post-occupancy verification.

6. Clarify employment uses and amenity safeguards

- Specify acceptable employment use classes, HGV routing, hours and acoustic/air quality mitigation to avoid conflict with nearby homes.

Lines of representation

We object to the EDEN14 brief in its current form on grounds that it is not positively prepared, not justified, not effective and not fully consistent with national policy, with particular concern regarding Green Belt release, flood risk, unresolved infrastructure, and cumulative impacts on Edenbridge. The brief should be substantially tightened along the lines set out above before any Regulation 19 Local Plan is published.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN15 – Land East of Mead Road

NEDRA Strongly Disagree

Overview of the Proposed Allocation

Site MX/21/00051 (Regulation 18 ref. EDEN15) is a 6.8ha majority greenfield site on the eastern side of Edenbridge, bounded by Hever Road to the north, commercial and residential development on Mead Road to the west, a public Gypsy and Traveller site to the east, and open countryside to the south. It includes a dwelling and garden, stables and outbuildings, grazing land and agricultural fields, with mature trees along boundaries. The land is entirely within the Green Belt, classified as greenfield, and recorded as 98.42% medium landscape sensitivity with Grade 3 agricultural land (83.38%) and a small “Urban” component (16.62%) in the agricultural quality table.

The SHELAA treats the full 6.8ha as developable, proposes 120 dwellings and 5 public Gypsy and Traveller pitches, concludes the site is “suitable” and “developable (years 6–10)”, and the Plan allocates it on that basis. We recognise that the site is near services and both stations. However, the way the Green Belt evidence, “grey belt” labelling, landscape sensitivity, River Eden corridor, density, Gypsy and Traveller delivery, and timing are handled raises serious concerns under the Regulation 19 Tests of Soundness, especially “justified” and “effective”.

Positively Prepared

The assessment describes EDEN15 as adjacent to the urban confines of Edenbridge, within 400m of the settlement, within 800m of the central and southern town areas, and within 2km of Edenbridge Town station. In distance terms, this is relatively sustainable.

However, EDEN15 is wholly Green Belt farmland on the edge of town, forming part of the open countryside to the south of Hever Road and east of Mead Road. It also lies within 15m of the River Eden Local Wildlife Site and within 200m of the Edenbridge Conservation Area and two listed buildings. A positively prepared plan should show clearly why this particular Green Belt field, which helps frame the town’s eastern edge and the River Eden corridor, has been preferred over less sensitive or previously developed alternatives, and how the mix of 120 houses and 5 public pitches has been calibrated to respect that context. The current evidence does not.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt, Stage 3 findings and “grey belt” labelling

The SHELAA confirms that the site “lies fully within the Green Belt adjacent to Edenbridge” and records that at Green Belt Stage 3 it was **not recommended for release**. Despite this, the conclusions go on to state that the site “constitutes grey belt land under national policy, due to its performance against Green Belt purposes A, B and D” and that, given its “grey belt status and unconstrained nature,” it is suitable for development and should be included in the Plan.

There is no explanation of how a site that Stage 3 explicitly **did not** recommend for Green Belt release has now been promoted as grey belt and “unconstrained”, nor any accessible narrative showing:

- how the parcel is said to perform against the Green Belt purposes.
- why its contribution to checking sprawl and safeguarding the countryside is considered weak; or
- why it now qualifies as “grey belt” notwithstanding the Stage 3 conclusion.

This internal contradiction, between “not recommended for release” and “grey belt / suitable / include in Plan,” is not resolved and undermines the robustness of the evidence base for releasing EDEN15 from the Green Belt.

Landscape, River Eden corridor and setting

The site is recorded as 98.42% medium landscape sensitivity, with no low-sensitivity areas. It also lies within 15m of the River Eden Local Wildlife Site, meaning the site is part of the immediate buffer to an important river corridor. The assessment simply notes these points and moves on, stating there are “no other constraints which would make the site unsuitable.”

There is no landscape or ecological assessment demonstrating:

- how 120 homes plus 5 pitches would sit in views from Hever Road, from the River Eden corridor, and from the existing Gypsy and Traveller site and open countryside to the south.
- how the development would respect or enhance the River Eden buffer, rather than enclosing or urbanising it; or
- what setbacks, green corridors or open space are needed to maintain an appropriate relationship with the Conservation Area and nearby listed buildings.

For a Green Belt field adjoining a river corridor, close to heritage assets and forming part of the town’s eastern edge, the lack of design- and landscape-led testing at allocation stage is a significant weakness.

Land-use inconsistencies and density

The site is described in the text as “a parcel of land containing a residential dwelling and associated garden, stables and outbuildings, grazing land and agricultural fields,” yet the assessment table lists the existing use as “No existing use” and the agricultural land quality as “Urban 16.62%, Grade 3 – 83.38%”. The presence of a dwelling, stables and a Gypsy and Traveller site next door suggests a more nuanced existing pattern than “no existing use” and a

16.62% “Urban” classification. This inconsistency calls into question how clearly the current character and function of the land have been understood.

Capacity is derived by treating the entire 6.8ha as “developable” and applying a yield of 120 dwellings plus 5 public pitches. On a simple gross calculation, that equates to around 17–18 dwellings per hectare across the whole Green Belt parcel (ignoring the space taken by pitches), which appears modest. But:

- land will be needed for the River Eden buffer, open space, attenuation, internal roads and the layout and amenity of the Gypsy and Traveller pitches.
- once those areas are taken out, the net residential density on the developable housing area will be significantly higher than the headline gross figure; and
- no indicative layout or design-led capacity work is presented to show how the 120 homes and 5 pitches, with proper separation, amenity, parking and green infrastructure, will fit on the ground.

The low gross density risks understating the intensity of development now and leaves open the potential for later pressure to “optimise” density further once the full 6.8ha has been removed from the Green Belt.

Gypsy and Traveller pitches – delivery and management

The allocation includes 5 *public* Gypsy and Traveller pitches as part of the site yield. The achievability section then states: “It is not clear who would manage the public Gypsy and Traveller pitches which are proposed.”

That is not a minor detail:

- The identity of the managing body and the proposed tenure/management model (public, registered provider, council) are central to whether these pitches will actually come forward and be sustained.
- Without clarity on management, funding and governance, there is a real risk that this element of the allocation becomes undeliverable or is delayed indefinitely.

Yet the Plan counts these 5 pitches in the supply and uses their inclusion to support the argument that EDEN15 is helping to meet identified Gypsy and Traveller needs. In soundness terms, this is a significant weakness in the evidence of “effectiveness.”

Contamination and noise

The SHELAA flags a need for a contaminated land assessment and a noise assessment due to adjacent commercial uses. No preliminary work is provided on:

- likely contamination sources and remediation scope.
- the scale of noise mitigation required near the commercial areas and Hever Road; or
- how these factors might constrain layout or increase costs.

These issues could materially affect both the developable footprint (e.g. requiring buffers) and viability. They are pushed to a later stage while the site is nonetheless treated as “unconstrained” in the conclusions.

Access and transport network

The assessment states that there is an “existing access” onto the site, that a secondary emergency access will be required, and that there is capacity on the transport network, though contributions for improvements may still be sought. There is no site-specific highways work demonstrating:

- where the second access would be located.
- how junctions on Hever Road and/or Mead Road would safely accommodate traffic for 120 homes plus 5 pitches; or
- how the cumulative impact with other Edenbridge allocations has been considered on the wider network.

For an allocation combining market housing with a public site and adjoining an existing Traveller site, robust access and movement planning is essential. That evidence is absent from the SHELAA summary.

Effective and Developable (Years 6–10)

Promoter information states that the site is “available now,” with anticipated commencement “by 2025”, completion by 2029 at 30–40 dwellings a year, and that there have been “numerous early expressions of interest from house builders”. The SHELAA then says the site is “considered to be available in years 1–5” but ultimately categorises it as “Developable (years 6–10)”.

As at December 2025, the assumed start date “by 2025” and early build-out are already out of date, yet there is no updated evidence in the SHELAA text on:

- the current status of any developer interest.
- whether the Gypsy and Traveller pitches have an identified managing body; or
- how the costs of contamination, noise mitigation, River Eden buffers, open space and access works affect viability.

The statement that there are “no other constraints which would make the site unsuitable” and that there are no viability issues is therefore a broad assertion, not clearly grounded in current, site-specific testing. For a mixed allocation involving both housing and public Gypsy and Traveller pitches on Green Belt land, that is not enough to demonstrate that EDEN15 is genuinely “developable” in the years 6–10 window.

Consistency with National Policy (Green Belt and Gypsy & Traveller Provision)

National policy requires that:

- Green Belt boundaries are altered only in exceptional circumstances, supported by robust, transparent evidence.
- even where land is categorised internally as “grey belt,” it remains Green Belt and its release must be clearly justified, with openness and Green Belt purposes given substantial weight; and

- provision for Gypsies and Travellers is properly planned, with a realistic prospect of delivery and suitable arrangements for long-term management.

For EDEN15, the Plan:

- Allocates a site that Stage 3 itself said was **not recommended for Green Belt release**, without providing a clear explanation of what has changed or why it is now treated as grey belt and “unconstrained”.
- Counts the entire 6.8ha as developable and derives capacity from a broad density assumption, rather than design-led work that responds to the River Eden buffer, Green Belt and local character; and
- Relies on 5 public Gypsy and Traveller pitches that the SHELAA openly admits have no identified managing body, raising real questions about whether this aspect of the allocation is deliverable.

That combination raises clear doubts about whether EDEN15 can be considered “justified” and “effective” in line with national policy.

Amenity, Integration and Local Character

The site sits immediately alongside an existing public Gypsy and Traveller site and backs onto existing housing and commercial development on Mead Road. The allocation does not address:

- how the new 5 public pitches will be integrated with the existing site in a way that maintains good standards of amenity and avoids over-intensification.
- how overlooking, privacy, and noise between the new housing, the Traveller pitches and existing neighbours will be managed; or
- how the scheme will present to the River Eden corridor and the open countryside to the south, in terms of boundary treatments and perceptions of openness.

These are central to the day-to-day experience of both existing residents and future occupants and should inform the size, layout and mix of the allocation.

Cumulative Impact on Edenbridge

EDEN15 is one of several allocations on the edges of Edenbridge. Taken together, they would:

- extend the built form further into the Green Belt.
- place greater pressure on the local road network, schools and health services; and
- incrementally urbanise the River Eden corridor and the town’s rural setting.

The EDEN15 assessment considers the site largely in isolation and does not transparently assess its role in that cumulative pattern, especially when combined with other eastern and northern allocations.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN16 – Land at Swan Lane

NEDRA Strongly Disagree

Overview of the Proposed Allocation

EDEN16 is a 41.9ha greenfield site on the north-east edge of Edenbridge. It is wholly within the Green Belt and comprises a large parcel of grazing land with a small cluster of agricultural buildings at Swan Lane Farm. It is bounded by existing residential development to the south and west and open countryside to the north and east. The SHELAA treats the entire 41.9ha as developable, proposes a yield of 600 dwellings (with employment land “TBC”), concludes the site is “suitable” and “developable (years 6–10)”, and the Plan allocates it for 600 homes.

We recognise that this is a large, contiguous site adjacent to the settlement and close to services in relative terms. However, the way Green Belt/grey-belt policy, landscape sensitivity, flood risk, access and network capacity, density and deliverability are handled is not robust. For a strategic Green Belt release of nearly 42ha at Edenbridge, the evidence does not clearly satisfy the Regulation 19 Tests of Soundness, particularly “justified” and “effective”.

Positively Prepared

The SHELAA notes that EDEN16 is adjacent to the urban confines of Edenbridge, within 400m of the town, within 2km of the central area and northern fringe, and within 800m of Edenbridge station and 2km of Edenbridge Town station. Those are positive accessibility indicators at a high level.

A positively prepared plan also needs to recognise that this is a very large tract of open Green Belt grazing land forming the northern and north-eastern setting of the town, with 100% medium-high landscape sensitivity and areas in Flood Zones 2 and 3 crossing the northern part of the site. The evidence does not clearly explain why releasing almost 42ha of countryside in this location is necessary, how it has been chosen ahead of less sensitive options, or how the proposed 600-unit capacity has been calibrated against these environmental and infrastructure constraints.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and “grey belt” status

The SHELAA describes EDEN16 as “in the Green Belt adjacent to Edenbridge” and records the Stage 3 classification as “grey belt”, before concluding that, due to its “sustainable location, grey belt status and unconstrained nature”, it is suitable and should be included in the Plan.

In practice:

- The site is almost entirely open grazing land with only a couple of farm buildings; it is not previously developed land.
- It sits between the built edge of Edenbridge and the wider countryside to the north and east, clearly helping to check outward sprawl and safeguard the countryside from encroachment.
- The conclusions simply assert that it is grey belt and of “unconstrained nature” without setting out a parcel-specific explanation of why this large open field is judged not to strongly contribute to Green Belt purposes or why releasing the full 41.9ha is justified.

Grey-belt labelling within the Council’s evidence base cannot, by itself, amount to the exceptional circumstances required to alter Green Belt boundaries. For a strategic site of this scale, the absence of a clear, transparent exceptional-circumstances narrative is a significant weakness in the justification for release.

Landscape sensitivity and settlement edge

EDEN16 is recorded as 100% medium-high landscape sensitivity. The conclusions acknowledge this only in passing, stating that “future scheme design will need to take into account [the] medium-high landscape sensitivity,” and then treat the whole 41.9ha as developable.

There is no published landscape or visual assessment showing:

- how 600 dwellings (and any future employment land) would appear in views from Swan Lane, Marlpit Hill, the surrounding countryside and public rights of way.
- whether the development would create a coherent, defensible new northern edge or appear as a very large urban extension projecting into open countryside; or
- what scale of structural planting, open space and set-backs are required to mitigate visual impact and maintain some sense of openness towards the rural north and east.

For a site of this size and sensitivity, capacity should be landscape- and design-led. The current evidence falls well short of this.

Flood risk and the “developable” area

The SHELAA records that 15.01% of the site falls within Flood Zone 2 and 3.35% within Flood Zone 3. These percentages are clearly the product of GIS overlays using current Environment Agency mapping, rather than any site-specific survey or design work, and there is no explanation of how they translate into a realistic developable footprint on the ground. The flood mapping shown on the plan (page 1) indicates multiple arms of floodplain and watercourses affecting the northern and north-eastern parts of the parcel.

The SHELAA conclusion simply notes that “small areas to the north of the site fall within flood zones” and that this, together with heritage and landscape sensitivity, “will need to be taken into account” at design stage. It does not:

- show how the sequential approach will be applied to keep housing out of Flood Zones 2 and 3.
- adjust the developable area to reflect land that must be reserved for water storage, attenuation and open space; or
- consider how updated flood data and climate change allowances over the plan period might alter the extent and depth of risk across this low-lying edge-of-town land.

Counting the whole 41.9ha as developable and only later “taking into account” the flood constraints is not a robust or precautionary approach for a strategic Green Belt release.

Capacity, density and future pressure for intensification

The SHELAA equates the developable area with the full 41.9ha and assigns a yield of 600 units. This implies a very low gross density of around 14–15 dwellings per hectare across the entire Green Belt parcel. On paper that appears modest, but it is only achieved by spreading 600 homes across the whole field, including land that in practice will need to accommodate:

- floodplain and drainage/attenuation features.
- structural planting and open space to address the medium-high landscape sensitivity.
- internal roads and junctions; and
- any employment or community uses that may ultimately be required.

Once these non-residential elements are taken out, the net developable area for housing will be considerably smaller and the real residential density much higher than the headline 14–15 dph. This raises two linked concerns:

- the low gross density risks **understating the true intensity of development and land-take** at Regulation 19 stage; and
- it leaves scope for **future pressure to “optimise density”** by increasing unit numbers once the entire 41.9ha has been removed from the Green Belt on the basis that 600 homes at 14–15 dph is “low for a sustainable location”.

No indicative masterplan or design-led capacity testing is presented to show how 600 dwellings, flood corridors, open space, access roads and any employment land can fit together on this sensitive site in a way that respects Green Belt purposes and landscape character.

Heritage, minerals and contamination

The site is within 200m of two listed buildings and contains land within a Minerals Safeguarding Area (Sub Alluvial River Terrace – 2.75%), and a contaminated land assessment is required. These constraints are acknowledged but then effectively set aside with the statement that “there are no other constraints which would make this site unsuitable.” There is no explanation of:

- how the layout and massing of 600 homes will protect the setting of nearby listed buildings.
- whether minerals policy will require prior extraction or non-sterilisation measures; or
- what potential remediation costs and constraints may arise from past land uses.

These matters are capable of materially affecting both the developable footprint and viability and should inform, not simply follow, the allocation and capacity decision.

Access and transport network capacity

The SHELAA notes that “new/additional access” is required and that there is “limited capacity on [the] transport network – may require improvements.” For a proposal of 600 dwellings plus possible employment uses, these are major constraints. Yet there is no site-specific highways assessment indicating:

- where main and emergency access points would be located on Swan Lane, Marlpit Hill or other roads.
- what junction improvements and link upgrades would be necessary to accommodate traffic from 600 homes: or
- how walking and cycling routes to schools, the town centre and the stations would be secured and made safe.

The conclusion that the site is of “unconstrained nature” is difficult to reconcile with a 600-home allocation on a network already recognised as having limited capacity and needing improvements.

Effective and Developable (Years 6–10)

Promoter information states that the site will be available and commence “by 2025” but gives no anticipated completion date and no evidence of developer interest or special measures needed for viability. The Council categorises the site as “developable (years 6–10)” and allocates 600 homes on that basis.

As at December 2025, the assumed commencement “by 2025” is already out of date:

- No permission exists and the Local Plan is not yet adopted.
- There is no clear phasing or build-out trajectory for a scheme of this scale; and
- The SHELAA simply asserts that there are “no constraints that could render the site financially unviable at this time” without any site-specific information about the cost of access works, flood mitigation, structural landscaping, minerals safeguarding or heritage-sensitive design.

For a strategic Green Belt allocation of 600 dwellings, on a site with acknowledged medium-high landscape sensitivity, flood risk and highway capacity issues, this level of deliverability evidence is inadequate.

Consistency with National Policy (Green Belt and Flood Risk)

National policy requires that:

- Green Belt boundaries are altered only in exceptional circumstances, supported by robust and transparent evidence.
- “Grey belt” remains Green Belt, and its identification does not remove the need to give substantial weight to openness and to Green Belt purposes or to prioritise less sensitive and brownfield sites; and
- development in areas at risk of flooding is planned on a sequential, risk-based basis, steering more vulnerable uses such as housing away from Flood Zones 2 and 3 where reasonably possible.

For EDEN16, the Plan:

- Relies heavily on the grey-belt label and adjacency to Edenbridge to justify releasing almost 42ha of open countryside, without a clear parcel-specific exceptional-circumstances narrative.
- Counts the entire site as developable despite 15% of the land in Flood Zone 2 and over 3% in Flood Zone 3, with flood risk treated as something to be “taken into account” at a later design stage rather than shaping the developable area and capacity now; and
- Uses a headline yield and low gross density derived from applying a broad figure across the whole parcel, rather than from design-led masterplanning that responds to flood risk, Green Belt purposes and landscape sensitivity.

This raises serious questions about whether the allocation is “justified” and “effective” in terms of the NPPF.

Amenity, Access and Local Highways

For residents in north-east Edenbridge, a 600-home extension at Swan Lane would substantially change day-to-day conditions:

- Local roads with acknowledged limited capacity would have to accommodate large volumes of additional traffic during both construction and occupation.
- The rural setting to the north and east of the town would be replaced by estate development across a very wide area; and
- “Without a clear access and movement strategy, there is a risk of drivers cutting through nearby residential streets to avoid main road congestion, leading to more traffic, noise and safety concerns for existing residents.”

These practical impacts are not assessed in the SHELAA conclusions, which simply note that network capacity “may require improvements.”

Cumulative Impact on Edenbridge

EDEN16 is one of the largest single allocations around Edenbridge and sits alongside other significant Green Belt releases to the west, north and east. Taken together, these allocations would reshape the town's relationship with its countryside setting, extend the built footprint in multiple directions and add very substantial traffic to local roads. The EDEN16 assessment does not transparently examine the cumulative effects of adding 600 homes at Swan Lane to this wider growth pattern.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response – Sites

EDEN17 – Seven Acres Farm, Hever Road

NEDRA Strongly Disagree

Overview of the Proposed Allocation

Site GT/21/00001 (Regulation 18 ref. EDEN17) is a 2.53ha site at Seven Acres Farm, Hever Road. It is an extension to the existing permanent Gypsy and Traveller site, proposing 5 additional pitches. The SHELAA classifies it as “partially brownfield” within the Green Belt. The site has strong physical boundaries: the railway line to the north and Hever Road to the south. It lies within 400m of Edenbridge, within 2km of the town’s central, northern and southern areas, and within 2km of Edenbridge Town station. Flood risk is recorded as Zone 1.

The assessment concludes that the site is “grey belt,” medium landscape sensitivity, Grade 3 agricultural land, partly within a Minerals Safeguarding Area, with potential contamination linked to former farm use and noise from the railway. It treats the whole 2.53ha as developable, identifies an existing access from Hever Road, states there is capacity on the local road network, and concludes that the site is “deliverable (1–5 years)” with 5 pitches allocated.

We accept that there is an established Gypsy and Traveller use here and that meeting identified pitch need is an important element of the Local Plan. Our comments focus on the Green Belt reasoning, the way “grey belt” is applied, and the reliance on broad assertions about viability and timing, in the context of the Regulation 19 Tests of Soundness.

Positively Prepared

The SHELAA rightly notes that EDEN17 is close to Edenbridge, with good access to public transport and services, and that the proposal is for a modest extension (5 pitches) to an existing permanent site rather than a wholly new site. Those are positive factors.

A positively prepared plan must still show clearly how this specific Green Belt site has been chosen and how capacity has been set so that the extension is proportionate, well-designed and compatible with its setting next to Hever Road and the railway. The assessment simply states that “the site has potential to accommodate additional pitches” and concludes that it is “in a suitable location for Gypsy and Traveller provision” without showing any design-led work on layout, separation distances, landscaping or how the extension will affect the overall size and character of the site.

Justified – Evidence Base, Capacity and Key Constraints

Green Belt and “grey belt” status

The site lies within the Green Belt and is described as “partially brownfield,” with hardstanding associated with the existing pitches. The Stage 3 assessment labels it as “grey belt”, and the conclusions then state that, due to its partially PDL status and performance against Green Belt purposes A, B and D, it is grey belt under national policy and suitable for development.

This raises two concerns:

- The SHELAA does not explain which parts of the 2.53ha are genuinely previously developed and which remain open land, nor how that balance has informed the size of the extension or the number of additional pitches.
- The “grey belt” label is asserted, not explained: there is no parcel-specific commentary on how this land’s role between Hever Road, the railway and open countryside has been assessed against Green Belt purposes, or why 5 more pitches, rather than a smaller or more carefully contained extension, is the right level of intensification.

For any Green Belt change, and particularly where the Council is relying on the new grey-belt concept, the Plan should provide a transparent explanation of exceptional circumstances and why this specific extension, in this form, is justified. That material is not evident here.

Layout, design and amenity

The SHELAA confirms medium landscape sensitivity, former farmland contamination risk, and the need for a noise assessment due to the railway. Yet there is no indicative layout or design testing showing how:

- the 5 new pitches will be arranged in relation to the existing ones.
- appropriate separation, outdoor amenity space, parking and play space will be secured.
- noise from the railway will be mitigated through orientation, bunding or acoustic treatment; and
- the southern edge to Hever Road will be landscaped to avoid a harsh or over-urbanised frontage.

Instead, the SHELAA simply states that the existing access can be used and that the site “has potential to accommodate additional pitches.” For Regulation 19, a modest extension still needs proportionate design-led evidence so that capacity is grounded in what a good-quality site can realistically accommodate.

Minerals safeguarding, contamination and noise

The site includes 6.88% land within a Minerals Safeguarding Area (River Terrace Deposits) and requires a contaminated land assessment (former farm use) and a noise assessment (railway). The conclusions do not address whether:

- minerals policy will require non-sterilisation measures or prior extraction.
- contamination or noise mitigation might constrain where within the 2.53ha new pitches can be placed; or

- the cost of any remediation or acoustic works could affect deliverability.

All three are flagged in the assessment but effectively parked for later, even though they go directly to where and how additional pitches can sensibly be accommodated.

Access and highways

The SHELAA notes an existing access from Hever Road and states that there is capacity on the transport network, although contributions towards improvements “may still be sought.” For 5 extra pitches, traffic volumes will not be comparable to large housing sites elsewhere in Edenbridge, but the extension will still increase movements, turning and larger vehicles using the access.

No evidence is provided on:

- whether the existing access meets current visibility and safety standards.
- how pedestrian safety will be protected along this stretch of Hever Road; or
- how any modest cumulative increase with other nearby sites (for example EDEN15) has been considered.

For soundness, the Council should at least show that the access has been tested and, if necessary, what small-scale improvements are required, rather than leaving this entirely to a future application.

Effective and Deliverable (Years 1–5)

The SHELAA records that the landowner considers the site “available now,” with anticipated commencement “now” and completions “ASAP.” There is no separate developer, which is unsurprising for a Gypsy and Traveller site, and the assessment concludes there are “no constraints that could render the site financially unviable.” The site is therefore categorised as “Deliverable (1–5 years)” with a timeframe “by 2025”.

As at December 2025, those dates are already out of date. The SHELAA text has not been updated to reflect the actual progress of any planning application, any site works, or any revised timetable for bringing the 5 pitches forward within the first five years of the Plan. In addition:

- No viability or cost information is provided to support the “no constraints” assertion, including the cost of access improvements, any remediation or acoustic works, and infrastructure such as drainage.
- There is no detail about how the extension will be funded, managed and maintained over the long term, which is central to the practical delivery of permanent pitches.

For a small but important strategic site intended to help meet identified Gypsy and Traveller need early in the plan period, the evidence on timing and delivery is therefore very limited.

Consistency with National Policy (Green Belt and Gypsy & Traveller Provision)

National policy expects that:

- Green Belt boundaries are altered only in exceptional circumstances, supported by robust and transparent evidence.
- even where land is partially previously developed, its openness and role in the Green Belt must still be given substantial weight; and
- provision for Gypsies and Travellers is properly planned, with realistic prospects of delivery and suitable arrangements for long-term management and site quality.

In relation to EDEN17, the Plan:

- Relies on a brief assertion that the site is grey belt due to partial PDL status and performance against Green Belt purposes, without providing a clear parcel-specific explanation of how that judgement has been reached or how the Green Belt test for further intensification on this site is met.
- Counts 5 additional pitches as “deliverable by 2025” without updating the timetable or setting out how known constraints (noise, contamination, minerals, access) will be addressed in practice.

While the general strategy of extending an existing permanent site rather than dispersing many small new sites is understandable, the evidence supporting this specific allocation is not yet presented in a way that clearly satisfies the “justified” and “effective” tests.