

Response to SDC Reg.19 Local Plan

Halstead Parish Council challenges the allocation of ST5-1

14-9-26

1. Summary Representation

Halstead Parish Council challenges the allocation of Site ST5-1 (Broke Hill Golf Course) in Sevenoaks District Council's Reg.19 Local Plan because it believes it to be unsound. The evidence set out below demonstrates that the allocation of Site ST5-1 is not positively prepared, not justified, not effective, and not consistent with national planning policy. In particular the proposed allocation conflicts with the Council's own Development Strategy (Policy ST1) on balanced growth, rural housing policy, Green Belt policy, infrastructure policy, transport policy, health & wellbeing policy, historic environment policy, natural environment policy, and the National Planning Policy Framework.

Halstead Parish Council has reviewed the public response to the live application on ST5-1. This allows the Parish Council and SDC to understand how the area is valued and what people would like to see from its future. A total of 1,329 public comments have been submitted to the application including the original and two amendments to the layout. Of respondents, 98.6% of respondents opposed the application of the site for 810 homes, 0.9% support and 0.5% neutral. The results demonstrate an overwhelming lack of support for the Applicant's proposal and SDC's inclusion of the site in Regulation 19. The responses provide a clear indication of the importance attached to the Green Belt site ST5-1 and the strength of local opposition to the scale of development currently proposed.

The comments provide a clear indication of why the current proposal is opposed and what local people want to see instead. Respondents expressed very high levels of concern about development on highly performing Green Belt, the environmental consequences of the proposed development, including loss of wildlife habitat, reduced habitat connectivity to the wider area, increased noise disturbance and increased light pollution, together with the lack of infrastructure, particularly but not limited to the lack of medical services (see Appendix 5) and secondary education, very poor public transport and inadequate water supply (the latter already an issue in some parts of the village), and that the impact of the 635 dwellings under construction at Fort Halstead has not been taken into account in the application for the development of ST5-1.

Site ST5-1 should be removed from the Reg.19 Local Plan because the allocation is unsound.

2. Key reasons for removal

- 2.1. The allocation is still 'pending', based on its status as a 'live' Outline Planning Application and there is no guarantee that Outline Planning will be given.**

- 2.2. The allocation is disproportionate to Halstead's role in the settlement hierarchy as a village and is therefore not positively prepared or justified:**
- 2.2.1. Policy ST1 states that villages should see only "small-scale development, limited or infill development, to support rural communities".
 - 2.2.2. Halstead is not identified as a Principal Town, Primary Service Settlement, or Secondary Service Settlement; it is a village.
 - 2.2.3. ST5-1 alone proposes 810 dwellings on approximately 66.67 hectares. When combined with ST2-34, ST3-7, ST3-8, ST3-9, and the extant Fort Halstead permission, the total growth affecting Halstead is approximately 1,596 units.
 - 2.2.4. That level of development is not small-scale, limited, or infill growth. It would alter the function, scale, and character of Halstead and is inconsistent with the Council's stated Spatial Strategy.
- 2.3. The Plan has not been positively prepared because it has not demonstrated that Site ST5-1 is required to meet local need:**
- 2.3.1. SDC's Housing Needs Survey (2021) identifies Halstead's local affordable housing need as 13 new affordable homes, which is already being addressed through a rural housing project, and has already commenced.
 - 2.3.2. It should be noted that planning permission has been given for Fort Halstead on the southern edge of the village for 635 houses of which 20% will be affordable housing. The first phase has already commenced for 93 houses, of which 19 will be affordable. This more than doubles the identified need of the village.
 - 2.3.3. Policy H3 supports housing in rural areas where it responds to identified local need. Allocating 810 homes at ST5-1 (of which 350 will be affordable) is not a proportionate response to that need and appears to use Halstead to meet wider strategic numbers, rather than a village-based requirement.
- 2.4. The allocation is not justified because it is contrary to National Policy: reasonable alternatives on brownfield sites have not been adequately evidenced.**
- 2.4.1. DS01 4.14 requires brownfield and previously development land to be assessed before Green Belt release, reflecting the NPPF approach that planning should make effective use of land and prioritise suitable previously developed land.
 - 2.4.2. DS01 4.20 refers to limited Green Belt release, but the Plan does not provide sufficient evidence of a robust brownfield assessment or explain why less harmful alternatives cannot meet the requirement before releasing a high-performing Green Belt site.
- 2.5. The allocation would cause substantial Green Belt harm and is not consistent with national planning policy.**
- 2.5.1. NPPF Ch.13 identifies the purposes of the Green Belt, including checking unrestricted urban sprawl, preventing neighbouring settlements from merging, and safeguarding the countryside from encroachment.
 - 2.5.2. The Council's own evidence (the ARUP report) identifies ST5-1 as high-performing Green Belt (NPPF Purpose A: Protecting against urban sprawl).

2.5.3. Releasing a site that performs strongly against Green Belt purposes requires compelling and clearly evidenced exceptional circumstances. The Plan does not provide that justification.

2.6. The allocation is not effective because the required infrastructure is not shown to be secured or deliverable.

2.6.1. The ward of Halstead, Knockholt, and Badger's Mount consists of three villages and lacks the infrastructure of major settlements to create sustainable communities.

2.6.2. Policy IN.OB.10 is to co-ordinate the delivery of necessary infrastructure of planned growth.

2.6.3. The infrastructure identified for ST5-1 and wider Halstead growth is limited and uncertain, including developer-funded A21/Hewitt's roundabout works, possible road safety measures, and improvements at Knockholt Station. The IDP highlights 4 areas for open space development for children and young people. SDC identified, in its Open Space study (2018), that Watercroft Woods had planning permission to become a cemetery, yet it has ignored its own study and continues in the IDP (2026) to develop a children's Open Space in the cemetery.

2.6.4. The Plan does not demonstrate sufficient secured provision for health, education, utilities, water, sewerage, emergency services, community facilities, or wider transport impacts.

2.6.5. For Reg.19 purposes, this undermines the deliverability of the allocation.

3. Detailed Regulation 19, Soundness Objections

3.1. Not Positively Prepared:

3.1.1. The Plan for ST5-1 has not been prepared on a strategy that properly reflects Halstead's village status, local housing need, infrastructure capacity, Green Belt constraints, or environmental sensitivity.

3.1.2. Policy ST1 directs village growth towards small-scale, limited, or infill development.

3.1.3. Policy H3 supports rural housing where it meets local need. The available evidence identifies only a limited local affordable housing need in Halstead, yet the Plan allocates 810 homes at Site ST5-1 and contributes to approximately 1,596 units affecting the village.

3.1.4. The allocation therefore fails to meet the Positively Prepared test because it is not an appropriate or proportionate strategy for Halstead.

3.2. Not justified:

3.2.1. A justified plan must be the most appropriate strategy when considered against reasonable alternatives.

- 3.2.2. The plan has not adequately demonstrated why ST5-1 is preferable to brownfield, previously developed, less environmentally harmful, or more sustainable locations.
- 3.2.3. DS01 4.14 indicates that brownfield options should be assessed before Green Belt land is released. The evidence does not clearly show that this has been done, nor does it explain why a high-performing Green Belt site should be selected, despite the availability of less harmful approaches (see also 2.4.3).
- 3.2.4. DS01 4.28. Pratt's Bottom (a rural village, according to LBB) was assessed by SDC in an Audit of Locations (2022) and it scored only 9 for 'essential infrastructure'. SDC's latest audit (2025) scored it as 39, even though there have been no significant changes in essential infrastructure. With this new upgraded score Pratt's Bottom becomes a 'Secondary Service Settlement' and means that 'exceptional circumstances' can be applied to site ST5-1, without proper justification. No Statement of Common Ground with LBB has been documented.

3.3. Not effective:

- 3.3.1. The Plan must be deliverable over the plan period.
- 3.3.2. The evidence identifies major unresolved infrastructure issues, including road capacity, road safety, car dependency, public transport limitations, education, healthcare, water, sewerage, utilities, and community facilities.
- 3.3.3. Policy IN requires infrastructure to support growth, while Policy T seeks sustainable low-carbon movement and realistic travel choice.
- 3.3.4. The Local Plan's Site Assessment Report (Jacob, July 2026 (draft)) identifies Halstead as a "red cluster" with low potential for modal shift. This means ST5-1 is likely to remain car-dependent and cannot be shown to deliver the transport outcomes required by the Plan.

3.4. Not consistent with national planning policy:

- 3.4.1. The allocation is inconsistent with the NPPF approach to Green Belt protection, sustainable development, infrastructure-led planning, environmental protection, and use of previously developed land.
- 3.4.2. National policy requires exceptional circumstances to justify alteration of Green Belt boundaries and gives substantial weight to Green Belt harm.
- 3.4.3. The Plan has not shown that exceptional circumstances exist for releasing ST5-1, nor that the harm can be outweighed by clearly evidenced benefits.

4. Infrastructure and Transport concerns

4.1. Car dependency has not been resolved contrary to Policy T:

- 4.1.1. Policy T10.2 states that the Plan seeks a sustainable movement network that supports healthy, inclusive, and low-carbon patterns of movement, reduces the need to travel by private car, and provides realistic travel choice.
- 4.1.2. Policy T10.8 recognises high car ownership in rural areas.

- 4.1.3. The Local Plan's Site Assessment Report (Jacob, July 2026 (draft)) identifies Halstead as a "red cluster", meaning the area is car-dependent and has a low potential for modal shift (see also 3.3.4).
- 4.1.4. This is direct evidence that ST5-1 is poorly placed to deliver the sustainable transport outcomes relied upon by the Plan.
- 4.2. Road capacity and safety measures are uncertain so the allocation is not effective:**
- 4.2.1. The only clearly identified road infrastructure appears to be A21/Hewitt's Roundabout capacity improvements, described as "widening works", and developer funded.
- 4.2.2. The document also records that TfL is waiting for the developer to agree payment for essential safety measures such as speed cameras and traffic lights.
- 4.2.3. Infrastructure that depends on later developer agreement is not sufficiently certain at Reg.19 stage to demonstrate that ST5-1 is deliverable, and is therefore poorly prepared, not effective, and not justified.
- 4.3. Public transport improvements are insufficient to justify strategic growth at this location:**
- 4.3.1. Knockholt Station improvements, including step-free access to platform 2, increased staffing hours, and improved access to the station and the car park, do not demonstrate that 810 homes can be accommodated without substantial private car dependency.
- 4.3.2. Local 'Action Stations' study (March 2026) highlights that this is not a well-connected station (see Appendix 1).
- 4.3.3. Improvements to a station do not in themselves resolve the rural location, limited modal-shift potential, or daily trip generation from a major residential allocation.
- 4.3.4. This will be compounded by the development of Fort Halstead (635 homes) and ST2-34, ST3-7, ST3-8, ST3-9: total 744.
- 4.3.5. There is no evidence that the very poor bus service currently serving Halstead, Knockholt, and Badger's Mount to Knockholt Station will be improved. This indicates the Plan is very poorly prepared, not effective, not justified.
- 4.4. Social and utility infrastructure has not been adequately evidenced, contrary to Policy IN and NPPF co-operation requirements:**
- 4.4.1. Policy IN9.1 refers to the need for transport, green and blue infrastructure, education, health, sports and leisure, emergency services, libraries, community centres, electricity, gas, water, sewerage, waste, recycling, telecommunications, and broadband.
- 4.4.2. NPPF paragraphs on effective co-operation require strategic planning authorities to take account of infrastructure providers' investment plans.
- 4.4.3. The Plan does not show that these services have capacity for ST5-1 and the cumulative Halstead growth, nor that mitigation is secured.

- 4.4.4. Water is a finite resource and Thames Water (letter, 29th April 2026) state, *“Following investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal”* (see also Appendix 2).

5. Environmental, heritage, and community harm

5.1. Green Belt openness would be permanently harmed, contrary to the NPPF and the Council’s Green Belt methodology:

- 5.1.1. Site ST5-1 comprises approximately 66.67 hectares of open countryside. Releasing it for 810 dwellings would materially urbanise the landscape and conflict with Green Belt purposes in NPPF Ch.13, including preventing sprawl and safeguarding the countryside.
- 5.1.2. The Council’s own assessment identifies Site ST5-1 as high-performing Green Belt, which weighs strongly against release.

5.2. Biodiversity impacts have not been satisfactorily addressed, contrary to National Environment policy:

- 5.2.1. Objective OB19 requires protection of the natural beauty of the Kent Downs and delivery of biodiversity net gain on new development.
- 5.2.2. The evidence cited in the ST5-1 Outline Planning documentation demonstrates biodiversity loss rather than biodiversity net gain. This has been confirmed by Kent Wildlife Trust’s report (November 2025) which suggests not only 10% loss of BNG but over the 15 year Plan a loss of 15% in relation to ST5-1.
- 5.2.3. Unless the Plan can demonstrate genuine, deliverable net gain and avoidance of loss, the allocation ST5-1 is not justified or consistent with environmental objectives.

5.3. Landscape and Public Rights Of Way would be harmed, contrary to National Environment policy and the purpose of protecting the countryside.

- 5.3.1. ST5-1 lies within the open countryside of the North Downs and includes Public Rights Of Way used by walkers, cyclists, ramblers, Duke of Edinburgh Award participants, and visitors from many areas of south London and the wider area.
- 5.3.2. The document BW3 refers to the duty of public authorities to further the purpose of enhancing and protecting natural beauty.
- 5.3.3. Allocating a 810-home estate on this landscape would not enhance the area and would reduce its rural, recreational, and landscape value.

5.4. Dark skies, tranquillity, and residential amenity would be affected, contrary to Health & Wellbeing and Air Quality policies.

- 5.4.1. Policy HW3.1a requires nearby occupants not to be significantly affected by obtrusive light, noise, vibration, or other pollution.
- 5.4.2. Policy AQ3 states that schemes with unacceptable impacts that cannot be mitigated should be refused.

5.4.3. Site ST5-1 would introduce substantial new lighting, traffic, noise, and activity into a dark village setting (see Appendix 3). The Plan does not demonstrate that these impacts can be acceptably mitigated.

5.5. Heritage harm has not been fully considered, contrary to Historic Environment policy HEN1:

5.5.1. Halstead has a conservation area and listed buildings identified in the Plan's designated Heritage Assets (SEC figure 7.1, p.214)

5.5.2. Objective OB20 seeks to protect and enhance the historic environment for future generations.

5.5.3. The cumulative effect of nearly 1,600 dwellings affecting Halstead would risk harming the setting, scale, and historic character of the village. That harm has not been adequately assessed or justified (see Appendix 4).

5.6. Community wellbeing would be undermined, contrary to the Plan's own health objectives:

5.6.1. Objective OB1 recognises the link between places, spaces, and residents' mental and physical health.

5.6.2. Policies HW6.1 and HW6.2 emphasise opportunities for wellbeing, social networks, active travel, and access to green open space.

5.6.3. ST5-1 would reduce access to valued countryside and introduce urbanising impacts. The allocation therefore conflicts with the Plan's stated objective of supporting healthy, well-connected communities.

6. Specific inaccuracies and evidence gaps

6.1. Housing numbers require clarification, which undermines the soundness of the allocation.

6.1.1. The Plan appears to refer to inconsistent figures for Site ST5-1, including 714, 741, and 810 dwellings. A strategic allocation of this scale must be based on clear, consistent, and reliable evidence, and is therefore poorly prepared.

6.1.2. The developer's application consistently refers to Sevenoaks Road as 'London Road' or 'Old London Road'.

6.1.3. Inconsistent figures make it difficult to assess infrastructure requirements, transport impacts, density, environmental effects, and whether mitigation is adequate.

6.2. The site description is out of date and does not reflect current conditions:

6.2.1. DS01 4.37 describes the site as a 'former golf course and driving range', but the document notes that the site has been unused for around eight years and has rewilded.

6.2.2. The clubhouse burnt down in 2022.

6.2.3. The hardstanding (former Golf Club car park) measures around 0.28 hectares.

6.2.4. Describing the site as ‘previously developed’ or relying on historic golf-course use risks understating its current ecological, landscape, and Green Belt value, as the land was formerly farmland with heritage orchards.

6.3. The brownfield evidence base is unclear contrary to DS01 and national planning policy:

6.3.1. The Plan relies on Green Belt release without clearly demonstrating the extent of brownfield and previously developed land elsewhere in the District being considered first.

6.3.2. DS01 4.14 and the NPPF’s emphasis on making effective use of land require such evidence. Without it, the allocation cannot be shown to be the most appropriate strategy and is therefore not justified.

7. Conclusion

7.1. For Regulation 19 purposes, ST5-1 Broke Hill should be deleted from the Local Plan.

The allocation is unsound because it fails all four soundness tests: it is not positively prepared, not justified, not effective, and not consistent with national planning policy.

7.2. The Plan is not positively prepared because it does not provide a proportionate strategy for Halstead as a village, does not respond to identified local rural housing need, and does not demonstrate that infrastructure and environmental constraints have shaped the allocation. Therefore, ST5-1 is not a sustainable site.

7.3. The Plan is not justified because it has not shown that ST5-1 is the most appropriate site when assessed against reasonable alternatives, including brownfield land, previously developed land, less harmful Green Belt sites, and more sustainable locations.

7.4. The Plan is not effective because the infrastructure package for ST5-1 is uncertain developer-dependent, and insufficiently evidenced. The Plan does not demonstrate that transport, health, education, utilities, sewerage, community facilities, and environmental mitigation will be delivered over the Plan period.

7.5. The Plan is not consistent with national planning policy because it fails to provide compelling exceptional circumstances for releasing high-performing Green Belt land, gives insufficient weight to Green Belt harm, and conflicts with national objectives on sustainable development, infrastructure-led growth, environmental protection, and effective use of land.

8. Modification Required

The required modification is therefore the removal of ST5-1 from the Regulation 19 Local Plan. HPC recognises and supports the need for a Local Plan but this Regulation 19 Local Plan, as it stands, is not acceptable. The Council should reassess housing numbers and distribution through an infrastructure-led and evidence-based strategy that prioritises brownfield and genuinely sustainable settlements, local rural housing need,

protection of the Green Belt, biodiversity net gain, heritage conservation, and the rural character of Halstead.

9. Questions

- 9.1. Is it legally compliant to add-in new documents as late as the end of August?
- 9.2. Is it legally compliant to adapt supporting documents throughout the consultation period?
- 9.3. What guarantee is there that affordable properties will be built?
- 9.4. There are 18 documents in 'Statements of Common Ground'; 15 of these are not signed or dated. Why is this?
- 9.5. There is no 'Statement of Common Ground' from the London Borough of Bromley. Why is this?

10. Appendices

- 10.1. Appendix 1: 'Action Stations' (local survey & report, March 2026) Item 4.3.2 (p.4)
- 10.2. Appendix 2: 'Water Infrastructure of Halstead Parish'
- 10.3. Appendix 3: 'Dark Village' (HPC Information brochure, 2026) Item 5.5.3 (p.6)
- 10.4. Appendix 4: HPC Map 'A Walking Plan of Halstead Village' Item 5.6.3 (p.6)
- 10.5. Appendix 5: Healthcare & Medical