

Farningham Parish Council

"Farningham Parish Council STRONGLY objects to the inclusion of Pedham Place proposal in SDC's Draft Local Plan in the strongest terms. We have considered the 'exceptional circumstances' arguments for this site, but believe that this site is wholly unsuitable for housing development of this scale. We object on many grounds, as detailed below. In summary, "the benefits proposed do not bring wider community or infrastructure benefits, nor outweigh the harm and destruction to the Green Belt". Therefore, on behalf of the Farningham residents, we reject the inclusion of this proposal in the Local Plan.

1. STRONGLY PERFORMING GREEN BELT LAND The site continues to serve the original purposes for which the Green Belt policy was established and has been reiterated in the revised NPPF 2018. In Sevenoaks District Council's own independent Green Belt Assessment of 2017, the site scored highly across all five purposes of the Green Belt, and secured some of the highest points in the entire District as 'strongly performing' Green Belt land. Indeed, the site was not included in the recommendation for potential sites for consideration of 'exceptional circumstances' such is the importance of the site in relation to the Green Belt.

(a) URBAN SPRAWL. "To check the unrestricted sprawl of large built-up areas." One of the purposes of the Green Belt is to prevent London sprawl and Farningham village shares its immediate border with Swanley and two London Boroughs. Protecting all Green Belt land within the parish is vital to protecting the wider area and District from London (and Swanley) urban sprawl. The site scored 3 in the SDC Green Belt Assessment of last year.

(b) MERGING OF TOWNS AND VILLAGES. "To prevent neighbouring towns from merging in to one another." As noted above, this site has wrongly been described as Swanley. This error shows that the development of this site would effectively join Farningham with Swanley. Development of this site would undoubtedly threaten the separate identity of Farningham. In addition, the development of this area also threatens the border with Eynsford and Crockenhill, and could over time lead to the disintegration of separation between all four communities. The site scored 5 - the highest available - in the SDC Green Belt Assessment: "An essential gap between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them."

(c) AREA OF OUTSTANDING NATURAL BEAUTY. "To assist in safeguarding the countryside from encroachment." Farningham is within the Kent Downs Area of Outstanding Natural Beauty and a strongly rural parish. This would be severely damaged by the development of this site. The site scored 4 in the SDC Green Belt Assessment: "Contains less than 5% built form and/or possesses a strong unspoilt rural character." The Countryside and Rights of Way Act 2000 states that the Local Planning Authority should conserve and enhance Areas of Outstanding Natural Beauty. The NPPF paragraph 115 states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. This development does not enhance or conserve the character of the landscape.

(d) A HISTORIC VILLAGE. "To preserve the setting and special character of historic towns." Farningham contains a highly important and strongly performing conservation area, and an historical centre, which reiterates its identity as a separate community to the surrounding towns and villages. Any development on this land would have a negative impact on the local conservation area, such as increased traffic congestion, worsening air pollution and higher risk of flooding, all of which are detailed further below.

(e) THE LAND IS NOT DERELICT. "To assist in urban regeneration by encouraging the recycling of derelict and other urban land." A golf course is not "derelict" land and it would not assist in urban regeneration by encouraging the recycling of it. It is also the site of the historic Fort Farningham, designated a Heritage Asset, which would be swamped by housing.

2. THE LACK OF 'EXCEPTIONAL CIRCUMSTANCES' Farningham Parish Council rejects the notion that the benefits proposed by the promoter under the exceptional circumstances would benefit Farningham or its residents. This is because the facilities currently proposed by the developer are already being provided for the existing communities, or will be inadequate given the size of the suggested development. In addition, the exceptional circumstances proposed by the promoter are neither fully evidenced nor justified, and so do not meet the bar to justify changes to Green Belt boundaries. Of the new infrastructure as stated by the promoter in the draft local plan:

(i) Leisure Centre

Farningham residents are well served by nearby leisure facilities in Brands Hatch, Sevenoaks, Swanley, Hextable, and Dartford. Sevenoaks Suns Basketball Club is planning to develop its own state-of-the-art sports facility in nearby Swanley. Other sites elsewhere, such as in nearby Swanley, are also being offered for leisure facilities that are both sustainable and closer to the populations that might want them - and which would not

involve the destruction of Green Belt land. With a population of only 1,319 in Farningham, there is little need for additional leisure facilities. In the nearby communities, there is also little requirement for additional leisure facilities: for example, the Swanley and Hextable MasterVision shows that Swanley residents want the current leisure facilities to remain, and remain in Swanley. The Pedham Place site is not in Swanley. We therefore strongly refute that an additional sports hall is needed for the existing population and we maintain that existing leisure provision is already being well catered for in the area, with the potential for additional/replacement sports facilities (in Swanley) without the need for thousands of new homes destroying the Green Belt.

#### (ii) Healthcare Facilities

Farningham already has a GP and dental surgery, with planning for a further medical practice in Farningham High Street going through the planning process. Any new GP surgery on Pedham Place is therefore unlikely to be used by existing Farningham residents. And one new GP practice could be considered wholly inadequate for the needs of Pedham Place given size of the development and would in fact increase the strain on the existing healthcare resources in Farningham and nearby communities (Swanley, South Darent, etc). With no emergency hospital provision provided, the strain would fall to existing hospitals, such as Darent Valley. The development will make the pressure on hospitals in Sevenoaks and neighbouring districts even more acute given that Sevenoaks district does not have a major hospital. The Pedham Place promoter, by their own admission, have held no discussions with the Clinical Commissioning Group (CCG) or NHS England. Given the move to healthcare hubs, and the decision by the CCG to have such a hub in Swanley town centre, there is no requirement for the healthcare facilities proposed. The proposals also do not align with the emerging Kent and Medway Strategic Transformation Plan for future primary health care delivery. We therefore conclude that the promise of a healthcare facility onsite is wholly inadequate for the development and offers no new or additional benefit to existing communities (thus failing an 'exceptional circumstances' test). It would also increase the strain on the existing health infrastructure to breaking point. The promoters' plans do not fit into the plans of the local CCG or NHS England. The building of Pedham Place would in fact have detrimental impact on the existing communities as it will only add to the healthcare burden of existing hospitals.

#### (iii) Schools

Anthony Roper Primary School in Eynsford caters for children in Eynsford and Farningham, (and West Kingsdown). The primary school suggested by the developers on the new site is aimed at catering only for the new residents of the development. No provision is made for several hundred secondary school children or their transport to existing schools. And, given the pressure on secondary school places - grammar schools in particular - in the area, it will in fact disadvantage children in Farningham and Eynsford, who may now fall outside the catchment areas for Wilmington and Dartford Grammar schools. We therefore believe there is inadequate provision of schools associated with the new development and any facilities on site will not be of benefit to the existing community anyway (and could in fact be a disadvantage).

#### (iv) Community use buildings

We reject the developer's suggestion of provision of community infrastructure for Swanley (note: not Farningham). Swanley is already well-served by community infrastructure run by Swanley Town Council (Alexandra Suite, Clocktower Pavilion, The Link Buildings, The Olympic bar, Five Wents Hall, the Howard Venue and so on). Farningham also has the Village Hall, Shand Hall, and St Peter & St Paul's Church for use by local community groups. We therefore reject the notion that an additional community centre is needed by the existing community due to the already high existing provision of community rooms, space and services offered.

#### (v) Employment through provision of offices and local retail

Shops in Farningham High Street have been closing. SDC recently granted the conversion of the Farningham Village Store to a house because of the lack of demand for retail provision. We therefore reject that there is a requirement for retail provision. Local communities are already well served by the shopping hubs in Bluewater, Dartford, Sevenoaks and Swanley. The provision of office and retail does not outweigh the harm by the destruction of the Green Belt. New employment opportunities on site would be intended to provide new residents onsite with employment opportunities, and this in itself provides no benefit to existing communities. This is the creation of a new town, not an enhancement of the existing village of Farningham and neighbouring villages. We therefore reject the notion that the employment will be of benefit to the existing community, where so much office and retail space continue to be converted to residential use.

#### (vi) A new, integrated village centre

We strongly object to this. Replacing the current community with a new town is not a benefit to the existing residents of Farningham. In the words of the promoters, it is the creation of a "new settlement" and "a community in its own right" (Promoter presentation to SDC and local parish councils, 13 August 2018).

(vii) Open spaces

We refute the suggestion that the developers will create nett new open spaces when so much of the Green Belt and the current open spaces will be destroyed.

(viii) Park and Ride

The plans for a park and ride scheme will add to the congestion on the roads on the A20, A225 and London Road, Swanley, especially during rush hour, when these roads are gridlocked and vehicles barely move. There are no fast lanes or bus lanes so there would be absolutely no benefit for people to use such a site or any transport connected to it.

(ix) Enhancement of AONB

We strongly deny the claim that this will enhance the AONB. Pedham Place is on the top of the North Downs and so is visible for long distances along the Darent Valley. It forms a backdrop to the views looking north. Lighting on this high ground would cause light pollution and be visible right along the Darent Valley. Development here would have a detrimental effect on the AONB. In addition, the Pedham Place site can be seen from Farningham Woods, a Site of Special Scientific Interest (SSSI). Development on top of the hill at Pedham Place would impact negatively all of the AONB, the setting of the open countryside, and the views and setting of the SSSI.

(x) Transport and access

We refute the suggestion that the development will enhance transport connectivity. Existing rail services locally are rarely able to cope, especially at Eynsford and Swanley, therefore the influx of hundreds of new commuters will exacerbate the existing pressures. But we agree with dismay it will connect Farningham with Swanley, thereby destroying our unique community and merge two separate and distinct areas, through the creation of a new town in between.

### 3. TRANSPORT

There will be no new road or rail infrastructure at the site. By their own admission, the promoters of Pedham Place have no transport plan and held no consultations with Highways Agency or Kent Highways. Previous planning applications at the site - for a service stations and a car park - have received objections from Kent Highways on traffic and safety ground. The Pedham Place site will potentially add 4,000 vehicles (based on the RAC Foundation figures for car ownership in Sevenoaks of 1.6 cars/vans per household) with access only to and from the existing road structure at the A20. This will cause substantial traffic congestion, making already overwhelmed infrastructure dangerous.

**A20 FATAL COLLISIONS:** Kent Highways have stated that there were 17 collisions in a three-year period to 30 September 2017 along the A20 between Pedham Place and Brands Hatch. In respect of KSIs, this is considered to be one of the most dangerous 3-mile stretch of roads in Kent. Various traffic schemes have been tried to reduce the dangers. Substantial development of the site will only exacerbate the situation, making the A20 significantly more dangerous and more congested.

**TRAFFIC CONGESTION:** Farningham already suffers from large amounts of traffic and higher levels of car ownership due to its surrounding road network of the M25, A20, A225, M20 all within the parish, and nearby A2 & M26. Traffic is already gridlocked at rush hour and when the Dartford Bridge backs up, rat-running occurs throughout the villages of Farningham and Eynsford (and Swanley, and along the A225 Dartford Road) The M25 Junction 3 junction ("Swanley roundabout") is often at capacity (or worse) due to knock on effects from the M25, A2, M20 or A20. With the only Pedham Place site exits and entry on to the A20, directly opposite the entrance to KCC's Household Waste Recycling Centre and Kent Highways' maintenance yard and a heavily used warehouse - all sharing the same roundabout - this will only further increase congestion at these busy junctions and roads, as well as through Swanley, where the unsustainably high levels of traffic and congestion are evidenced in the independent Transport Assessment by SWECO as part of the Swanley and Hextable MasterVision.

**RAIL GRIDLOCK:** With no train stations in Farningham, rail transport is provided through Swanley, Eynsford and Farningham Road. All require transport - on the existing road infrastructure - to get to the stations. And the existing rail infrastructure is already at full capacity during commuter hours. The mitigation measures proposed by the developers for increased electrical vehicles, cycle lanes, and bus & taxi services are wholly inadequate - and, indeed, will only serve to increase the congestion and RTCs as they will all still use the existing road infrastructure. The development contravenes some of the key policies of the KCC Local Transport Plan to:

- Deliver resilient transport infrastructure that reduces congestion and improves journey time...

Provide a safer road, footway and cycleway network to reduce the likelihood of casualties• Deliver schemes to reduce the environment footprint of transport and enhance the historic & natural environment• Implement measures to improve local air quality (see below - the A20 hill from Kings' roundabout (for Dartford Road) and the Button Street junction is already an AQMA)There are no proposals for employment uses that could support the whole population so most will need to travel to employment beyond it. There is also the additional recreational traffic that about 6,200 people at Pedham Place would generate to consider - to access the beautiful Darent Valley or nearby facilities in the Darent Valley villages; Sevenoaks; Dartford and Bluewater; as well as Brands Hatch just 3 miles away (too far to walk) and the rest of the Kent countryside - putting further pressure on the A225 and A20 in particular. This is not a benefit for existing communities, but a side effect harm of building a new town in a bubble without consideration of the already full-to-capacity infrastructure.

Pedham Place therefore cannot be considered a sustainable location for development. The fact that there is no direct access to existing viable and sustainable public transport from the site will result in reliance on cars to access to the site for housing and employment. There is no potential for direct and fast access to rail connections at Swanley or Eynsford via dedicated routes which are safe, secure and accessible for all. Proposed proximity to rail connections does not take account of physical and topographical barriers which mean that residents and workers are unlikely to walk. Realistic projections of walking times will be between 30 and 45 minutes for both stations, and will only be suitable for able-bodied persons. Travel to either station will be unsafe for children and older people in particular due to the need to traverse busy road junctions. The proposed park and ride is unrealistic with no evidenced need. Potential health, education and leisure facilities will either encourage further journeys by car or promote dangerous journeys across busy intersections not designed to accommodate such journeys. Encouraging sustainable movement by walking and cycling from neighbouring villages cannot be achieved via safe and accessible routes for everyone that are direct, overlooked, well-lit and with distinct routes without fundamentally changing the characters of the Green Belt and the AONB.

#### 4. IMPACT ON AIR QUALITY.

Farningham already suffers from high levels of air pollution due to existing traffic congestion and nearby motorway roads. Both NO<sub>x</sub> emissions and CO<sub>2</sub> emissions are incredibly high, which affects health (physical and mental), wellbeing and ultimately life expectancy of local residents. Farningham already has two areas under air quality management because of high nitrogen dioxide levels, on the A20 and on the M20. Air quality in Farningham is already at dangerous levels. More vehicles using the A20 will only add to the air quality issues.<sup>7</sup>Pedham Place currently provides a green lung and buffer between the incredibly busy M25 motorway and the conservation area of Farningham. The noxious emission levels are also exacerbated when the Dartford Bridge/Tunnel backs up, and traffic is often brought to a standstill from junction 3 of the M25. Therefore, this Green Belt land remains the only tool available to keep the pollutions level from becoming worse.

#### 5. VERY HIGH RISK FLOOD ZONE.

Farningham village lying in the Darent Valley is within a very high risk flood zone (Flood Zone 3) with the existing community prone to all of river, ground and surface water flooding. The surrounding hills, trees and countryside act as a natural absorber of rain water. Settlements in the Darent Valley, including Farningham, are located at the base of steep valleys. Proposals for Pedham Place would create significant peak surface water run off which would exacerbate the potential for flooding in the villages and could pose a significant risk to existing homes and businesses located on or near the River Darent.According to the Kent County Council "Flood Risk to Communities: Sevenoaks", 121 dwellings in Eynsford, 33 in Farningham, and 207 in Horton Kirby and South Darenth are at overall risk of flooding - and building on Pedham Place would exacerbate the threat. The development of this site does not "provide wider sustainability benefits to the community that outweigh flood risk" (Sevenoaks District Council, Level 1 Strategic Flood Risk Assessment of 2017).

#### 6. DAMAGE TO HISTORIC ASSETS

Fort Farningham is a Scheduled Monument and a unique and important part of our national history. Of the 15 such mobilisation centres constructed during the 1890s, Fort Farningham is considered unique by Historic England: "Unusually for this type of monument, Fort Farningham has remained largely free of alteration or renovation and, despite the infilling of the ditch, survives comparatively well and will retain evidence relating to the construction and use of mobilisation centres, including the tunnels beneath the rampart which are unique to Fort Farningham." The monument, positioned on a strategic hilltop position, is more than just the current neglected remnants of the buildings itself, but the topography of the surrounds, the tunnels and the broader defensive positions. As a result, Historic England declares: "As a short-lived and rare monument type,

all mobilisation centres with surviving remains sufficient to give a clear impression of their original form and function are considered to be nationally important.”

Although the promoters claim that the Fort will be reinvigorated by the proposals, the damage done to the surrounding topography, archaeology and the defensive ecosystems that underpinned this “nationally important” monument will have a negative impact. “A good general rule for scheduled monuments that contain buried archaeological remains is: the less disturbance of the ground the better” (Historic England). The development would involve significant disturbance of the ground. Indeed, SDC itself has noted in previous planning applications that “the site lies in a sensitive area with the possibility of finding archaeological remains in association with Fort Farningham” that goes beyond the listed site.

Any consideration for development of the site requires the agreement of the Secretary of State for Culture, Media and Sport.

## 7. EXCESSIVE HOUSING DENSITY

Farningham has a population of 1,319 (as of 2011 census), in 598 homes. The site proposes adding 2,500 homes (potentially 6,230 people, based on an extrapolation of nearby towns), which would increase Farningham’s population almost five-fold. Development of this site will in fact make it a new town in the Green Belt and swamp the existing village and community. Indeed, the 40DPH figure is far higher than that for our existing community.

## CONCLUSION

In conclusion, Farningham Parish Council thoroughly rejects the proposals on sound planning grounds.

Farningham Parish Council dismisses claims for exceptional circumstances, considering that all the proposed infrastructure is either already being met or disadvantages existing residents, and is wholly inadequate for the size of the development. The exceptional circumstances proposed by the promoter are neither fully evidenced nor justified. There is no need to desecrate the Green Belt for what are marginal benefits at best, and will have significant detrimental impact to the local communities at worst.

We believe the promoter of Pedham Place has not justified with suitable evidence that the site can achieve sustainable development. The proposed benefits gained from the housing development do not outweigh the loss - such as the Green Belt (reinforced by Sevenoaks District Council’s own Green Belt Assessment), AONB, setting of a historic asset, character of existing villages and relationship the open countryside, potential merging of urban areas and views of setting of SSSI (Farningham Woods). The long term impacts are certainly not sustainable in terms of additional air pollution in an existing AQMA, additional traffic congestion in a pinch point in the strategic road network, additional strain on healthcare, education and public transport provision, physical and visual intrusion to the neighbouring villages, and the viability of business and leisure use.

We strongly urge Sevenoaks District Council to remove this land from submission as part of the Local Plan. It fails to meet any exceptional circumstances stated and fails to receive public support from the locally elected representatives or local community.”