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**Objections to the inclusion of the Pedham Place site (ST2-28) in Sevenoaks District Council’s Draft Local Plan 2040**

General planning issues

In respect of ST2-28, the draft Local Plan 2040 is neither sound nor compliant under the Council’s Duty to Cooperate. It is fully appreciated that 93% of Sevenoaks District Council’s area comprises Green Belt land in an Area of Outstanding Natural Beauty, within the ‘Garden of England’, and that this fact presents an obvious difficulty in achieving the housing target requested by Government. However, it is understood that SDC has not properly discharged its “Duty to Co-operate”, by exploring neighbouring Districts’ progress towards meeting their own housing targets. Furthermore, in Part 1 of the Local Plan 2040, SDC claimed that “at this stage we are not considering any Green Belt release”.

The proposal is dismissive of the landscape sensitivity of the site, despite ST2-28 being both Green Belt and in an Area of Outstanding Natural Beauty, and it also contradicts the North Downs AONB Management Plan. Pedham Place is significant to the maintenance of the original aim of the Green Belt – ie to protect rural England from envelopment by urban sprawl. Allowing development beyond the boundary created by the M25 would set a precedent, inviting further erosion into this AONB.

The existing town of Swanley already produces a significant amount of light pollution in the Darent Valley: the development envisaged by ST2-28 would inevitably make this pollution much worse.

Significantly, site ST2-28 (formerly identified as MX48) continues to be misleadingly identified as being located in Swanley. In a physical sense, the Pedham Place site is entirely disconnected from Swanley, by the location of M25 and the infrastructure of the large M25 Junction 3 (J3) (which includes access to the A20 towards London and the M20 towards Dover). Furthermore, the site is located almost entirely within the Parishes of Farningham and Eynsford, with only a narrow area immediately to the south of the M25 being identified as “Swanley”.

The site’s location renders it inadmissible to the Local Plan 2040 as a suitable “Strategic Development Site” for the following highly significant reasons:-

Traffic Congestion

* Swanley Town Council’s Traffic Study has previously identified an “inability of existing junction to M25 to cope with current level of traffic.” This “inability” is now worse than ever.
* There is limited opportunity for multiple access points to the site, due to the fact that the site is bounded on three sides by the M25, by narrow rural roads and by a local covered reservoir.
* Previous planning applications submitted for the development of this site have been refused on the basis of traffic congestion and insufficient road infrastructure. Traffic congestion has significantly worsened in recent years.

Site access, both by foot and bicycle, is untenable

* Walking and cycling routes to Swanley are unsafe and unclear. The railway stations at Eynsford and Farningham Road are both out of walking range.
* The topography around the site makes walking and cycling both unsustainable – Pedham Place is located at the top of Farningham Hill, which is very steep, adjacent to the junction of two major motorways and cut off from Swanley town by the heavily congested M25 J3 roundabout. The M25 carriageway travels over the junction, the M20 carriageway travels underneath. Creating a safe pedestrian / cycle route would require the installation of a subway under the M25.

Public health

* Electricity pylons carry high voltage power lines across the site: there remain serious health concerns associated with living and / or working, in proximity to the electromagnetic fields generated by such power lines.
* Defra’s Air Quality Management Area records show unlawfully high levels of air pollution on the A20 between Pedham Place and the roundabout junction with the A225 Dartford Road. This regularly breaches European safety standards. This excessively high pollution is significantly exacerbated by regular congestion on the M25, north-bound, with frequent queuing to the Dartford Crossing, backing up towards Junction 4.

Flood Risk

* The open land at ST2-28 currently acts as a sponge to absorb rain water. Developing the land would involve capping much of the space with concrete and tarmac, leaving the water with nowhere to go, but down Farningham Hill to the River Darent, with potentially serious consequences for many of the homes on Sparepenny Lane and London Road in Farningham.

I strongly urge Sevenoaks District Council to remove site ST2-28 (land at Pedham Place) from submission as part of the Local Plan 2040. The site fails to meet any exceptional circumstances and also fails to receive public support, both from the local community and also from the locally elected representatives of that community.