

Farningham Parish Council
response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Executive Summary:

Farningham Parish Council wish to formally object to the continued development of 'Plan 2040, A new Local Plan for Sevenoaks District' in its current form, as it is unlikely to meet the 'Test of Soundness' as set out in the National Planning Policy Framework.

Sevenoaks DC Plan 2040 does not reflect relevant changes to National Planning Policy Framework (updated December 2023), and related amendments to the Levelling-Up and Regeneration Act (November 2023).

Sevenoaks housing target of 10680 within Plan 2040 should no longer be seen as mandatory, but rather advisory, in line with revisions to the National Planning Policy Framework, and the exceptional characteristics of Sevenoaks District.

Land allocations Options 1 to 3 proposed, should be reconsidered, and alternative options which do not require release of Green Belt, and / or Natural Landscape (AONB) sites put forward for consideration.

Sevenoaks DC should seek to collaborate strategically with neighbouring authorities, to help meet future housing need through mutual agreement.

The current consultation for Plan 2040 does not meet the standards expected under Sevenoaks DC own 'Statement of Community Involvement', in terms of its timing, clarity and accessibility.

Notwithstanding comments above, Farningham Parish Council believe Option 1 of current proposals, will minimise negative impacts locally whilst meeting most of the local housing need.

Farningham Parish Council wish to strongly object to the inclusion of site MX-15 Pedham Place in any future options for housing or mixed-use development.

Any perceived benefits from development of site MX-15 cannot justify release from national Green Belt Policy, or damage to the Kent Down Natural Landscape.

Proposals for Pedham Place do not evidence the necessary 'exceptional circumstance' for release of green belt land, and do not demonstrate minimum expectations for 'Sustainable Development,' that meets identified local need.

Conclusion

Farningham Parish Council believe that Sevenoaks DC must review Plan 2040 in line with the current requirements of the National Planning Policy Framework, and **reconsult with compliant options**. Pedham Place should be considered an '**inappropriate development**' location due to its location in the Green Belt, the Kent Downs National Landscape (AONB), and no justification of 'exceptional circumstances' being evidenced. We believe that the Baseline Option should be reconsidered as a reasonable response to need identified, in the district.

Farningham Parish Council

response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

**Detailed Response from Farningham Parish Council, to
Local Plan (SDC Plan 2040) Regulation 18, consultation.**

Farningham Parish Council wish to **formally object to the continued development and associated consultation of the 'Plan 2040, A New Local Plan for Sevenoaks District'** at this time, as we do not feel the current proposals are likely to meet the Test of Soundness, set out in the National Planning Policy Framework (revised December 2023) to be; positively planned; justified; effective; and consistent with national policy which has been written since the current consultation was launched.

Farningham Parish Council propose that the current consultation be paused until the implications of the Levelling up and Regeneration Act 2023, and revisions to the National Planning Policy Framework, are fully understood, and their relevance to proposals within the current draft Local Plan, for Sevenoaks District are duly considered and reflected in proposals.

Farningham Parish Council wish to reinforce our concern that the current consultation process is untimely and potentially misleading to residents. The current consultation process was launched on 23rd November 2023, following the Levelling-up and Regeneration Act 2023 receiving Royal assent on 26th October 2023, and related revisions to the National Planning Policy Framework which were announced on 19th December 2023.

The Levelling-up and Regeneration Act sets out a clear intention for government to make fundamental changes to the Development Plan process. The National Planning Policy Framework sets out the framework in which Sevenoaks DC must now work, and provides clarity on strategic issues relevant to Plan 2040.

Farningham Parish Council appreciates that Sevenoaks DC have been unfortunate in these timings which were outside of their control, however, we believe that pursuing Plan 2040 consultation at this time is likely to fall foul of meeting the 'Four Tests of Soundness', set out in the National Planning Policy Framework, specifically to be 'consistent with national policy', which will apply at the time of submission. The National Policy Framework states that 'the local planning authority should rigorously assess the plan before it is published under Regulation 19, to ensure that, in their view, it is sound and meets all necessary legal requirements.....in particular, they should ensure that it takes full account of all relevant policies in the National Planning Policy Framework'.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Farningham Parish Council wish to **formally object to the continued development and associated consultation of the 'Plan 2040, A New Local Plan for Sevenoaks District'** currently, as it does not reflect relevant changes to National Planning Policy Framework (updated December 2023). In particular, and of relevance to the current Plan 20240 consultation, the National Planning Policy Framework states:

- The purpose of the English Planning system is to promote Sustainable development, which means '*development which meets the needs of the present without compromising the ability of future generations to meet their needs.*' NPPF para 7
- Local Plans must be informed by a Sustainability Appraisal, which meets the current and relevant legal requirements. NPPF para 32
- To determine the minimum number of homes needed by a local authority in the Local Plan, the outcome of the 'standard method of assessment.' should be seen as **an advisory starting point and not a mandatory housing target**. There may be 'exceptional circumstances' which justify an alternative approach to assessing housing need. NPPF para 61
- New settlements can be considered provided they are well located and designed, and supported by the necessary infrastructure and facilities, including a genuine choice of transport modes. **Working with the support of local communities**, suitable sites can be considered where they can help meet local need in a **sustainable way**. NPPF para 74.
- NPPF reinforces clearer protection to the Green Belt, 'once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to **review or alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified**. NPPF para 145
- **Inappropriate development** is, by definition, harmful to the green Belt, and should not be approved except in very special circumstances.

Farningham Parish Council believe that the above changes and clarifications to the NPPF are so fundamental to the Sevenoaks Local Plan 2040, process, assumptions, and current proposals, that Sevenoaks DC must pause the current consultation until these issues have been fully considered and reflected in proposals for future consideration, when a refreshed Regulation 18 consultation should take place.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Farningham Parish Council believe that the review of the current proposals in the Sevenoaks Plan 2040, Regulation 18 consultation should be reconsidered to include:

A revised housing target for Sevenoaks District which reflects the physical limitations of a District with 93% Green Belt. Sevenoaks housing target of 10680 within Plan 2040 should no longer be seen as mandatory, but rather advisory, in line with revisions to the National Planning Policy Framework, and the exceptional physical characteristics of Sevenoaks District.

Sevenoaks DC should seek to identify an appropriate housing number that is achievable **without dependence on Green Belt** or sites of National Landscape importance, (Area's of Outstanding National Beauty).

In line with the direction of NPPF, Sevenoaks DC should review identified brownfield and other sustainably located sites adjacent to good public transport routes in the district to evaluate locations for appropriate densification. '**Gentle densification**' in the right locations can help achieve a housing trajectory greater than the 8500-baseline proposal for the district, whilst staying within national planning policy.

Sevenoaks DC should seek to collaborate strategically with neighbouring authorities, specifically Dartford Borough Council, to help meet future housing need through mutual agreement. The **Statement of Common Ground** agreed between Dartford BC and Sevenoaks DC (first signed May 2019, and updated December 2021) states '*there could be a case to be made for Dartford BC to assist with some unmet needs from Sevenoaks DC in the future subject to a number of factors*'. It is unclear why Sevenoaks DC have not formally made a request for Dartford BC to help take its housing need through mutual agreement.

Before Sevenoaks DC can conclude that exceptional circumstances exist to justify changes to Green Belt boundaries, they must be able to demonstrate that it has **examined fully all other reasonable options** for defining appropriate numbers and meeting its identified need for development.

Land allocations Options 1 to 3 proposed in the Plan 2040 Regulation 18 consultation, **should be reconsidered**, and alternative options which do not require release of Green Belt, and / or Natural Landscape sites put forward for consideration. Options should remain ambitious but realistic in line with the opportunities for flexibility outlined above and in the NPPF.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Farningham Parish Council wish to **formally object to the continued development and associated consultation of the 'Plan 2040, A New Local Plan for Sevenoaks District'**, as we do not believe that the current consultation adequately reflects the principles and ethos of Sevenoaks District Council, **Statement of Community Involvement**, as required under the Planning and Compulsory Purchase Act 2004.

Farningham Parish Council wish to raise concern that we do not believe that the current consultation process meets either the ethos or requirements of the National Planning Policy Framework or Sevenoaks District Council's 'Statement of Community Involvement' regarding the quality, clarity, and accessibility of the current engagement process. The National Planning Policy Framework requires that Local Plans '*be shaped be early, proportionate, and effective engagement between plan makers and communities.....and contain policies that **are clearly written and unambiguous**, so it is evident how a decision maker should react to development proposals.*

Sevenoaks District Council's, 'Statement of Community Involvement,' sets out the council's objectives for engagement and includes '*Our aim is to improve opportunities for the community to get involved in shaping the planning policies in our District and **to ensure that our residents have a greater sense of ownership** in planning decisions and outcomes. The statement also sets out that 'the council will undertake a public consultation for a **minimum of six weeks**. The Council will endeavour to run consultations for **up to 8 weeks**, where possible'. The council commits to '*provide everyone with the opportunity to know what is going on and how they can get involved if they want to.*'*

The current Plan 2040 Regulation 18 consultation is open for 7 weeks, from 23rd November 2023 until 11th January 2024, however this period includes the Christmas and New Year holiday period and has been punctured by the announcements of the revised National Planning Policy Framework which could be confusing to residents. Furthermore, we understand from residents who have signed up to be kept informed of the Local Plan process that they did not receive notifications, whilst others have been advised of problems with communication in the first weeks of the consultation process.

No engagement sessions are planned between 13th December and 4th January which therefore should be excluded, meaning that this extremely important, and complex consultation for the communities of Sevenoaks is allocated effectively a 4-week consultation period. Sevenoaks DC guidance specifically for DPD Regulation 18 consultation, as set out in the Statement of Community Involvement, states 'the Council will undertake a public consultation for a minimum of six weeks. The Council will endeavour to run consultations for up to 8 weeks. This accelerated, and poorly timed consultation process means that genuine engagement with the communities most affected by proposals has not

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

been possible. No in-person engagement sessions were planned for Farningham or Eynsford, two villages who will be most impacted by the Pedham Place proposals. An engagement session has now been planned for Farningham on 4th January, giving residents only 7 days to respond following this engagement.

Farningham Parish Council also wish to raise concerns as to how the current Plan 2040 has been presented to residents through the consultation; we believe that information provided is often inaccurate, confusing, and contradictory.

Information regarding the proposals for Pedham Place to be included as a future development site does not meet basic standards for accessibility and is not presented in a way to enable residents to understand and make an informed decision or response to the consultation. Proposals for Pedham Place linked to the Plan 40 consultation site include proposals for site MX-15 as a proposed standalone settlement, however associated maps also include Pelham Farm site on the other side of the M25/M20/A20 junction and include references to MX-21 which is confusing. It is unclear whether references to a proposed 28,000 seat stadium are included within the Plan 2040 consultation, yet at the in-public engagement sessions run by Sevenoaks DC, plans for both sites are displayed together, and letters of representation from WASPS are included in links. The Plan 2040 consultation site wrongly addresses Pedham Place as London Road, Swanley, when the site sits across both Farningham and Eynsford parishes and is separated from Swanley by the M25/M20/A20 junction. The Plan 2040 consultation site states that site MX-15 Pedham Place is included under Option 2 only, when in reality it is part of both Options 2 and 3. The consultation asks residents 'what are your thoughts on this site', offering a range of choices from 'strongly agree' to 'strongly disagree', however it is unclear what residents are commenting on.

Address: Pedham Place, London Road, Swanley
Suitability: Maybe

Overall Conclusion	Developable (6-10, 11+ years)
If 'Include' - Reg 18 Site Reference	Include in Plan MX15
SDC Comments	The site is considered suitable for development. Due to the sites location within the AONB, the site is not currently proposed for allocation, but included for further consultation in order to gather further information. The site is included in the consultation document for a mix of uses, including 2,500 residential units, 4.9 ha of employment land, a multi-use stadium, training ground and hotel.
Development Strategy Options	Option 2, Option 3

MX/21/00044
Pedham Place, London Road, Swanley

What are your thoughts on this site?

Strongly agree
 Agree
 Neutral
 Disagree
 Strongly disagree

Do you have any further comments?

[Pedham Place Story Map](#)
[Pedham Place Location Plan](#)
[Highways Slides Final January 2022](#)
[Lichfield Pedham Place Settlement Study 10-01-22](#)
[Pedham Place Call for Sites Form FINAL](#)
[Stantec Pedham Place PDF](#)
[Stantec Sustainability Vision Pedham](#)
[TPM Pedham Place AONB Assessment](#)
[Urbbed Final Scheme Brochure](#)
[Representations to Sevenoaks District Council on behalf of Wasps RFC](#)

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Farningham Parish Council do not believe the Plan 2040 consultation meets the standards as set out in the Sevenoaks DC Statement of Community Engagement *'to support this, the Council aims to provide information that is local and relevant and **use methods of involvement that are accessible**.....in line with the Equality Act (2010) and the West Kent Equality Partnership aims and commitments, the Council wants to ensure that all communities have the ability to respond to consultations and have their voices heard'*.

Farningham Parish Council also wish to raise concern in the way residents across Sevenoaks District have been asked to choose between three options for future housing growth, all of which require building on both Green Belt and Natural Landscapes (Areas of Outstanding Natural Beauty). Each option presented will affect varying existing settlements to a greater or lesser extent, and in effect is a divisive process whereby villages and towns have been pitted against each other to protect sites closest to them, and residents have been stressed by proposals, rather than being given the opportunity to carefully consider what is best for their district together. This process fundamentally contradicts the principles of the Levelling Up and Regeneration Act whereby local communities are meant to be empowered to plan positively for their places, and Sevenoaks DC, Statement of Community Engagement which states that *'together we will help shape the District for future generations, ensuring that all groups in the community are able to engage in the planning process. This will also **help to promote enhanced physical and mental well-being** through people feeling a sense of place and connection to the district.'*

It is unclear how Sevenoaks DC intend to use the responses to the Plan 2040 Regulation 18 consultation to determine how they will finalise their Regulation 19 proposals. If the number of responses to each preferred option is seen as a reasonable guide, this would appear to be an unfair and unbalanced approach, with sites next to larger settlements having a greater number of interested residents to respond. Farningham Parish Council are also concerned that media headlines and speculation around proposals including a proposed 28,000-seater for WASPS Rugby at Pedham Place during and in advance of the Plan 2040 Regulation 18 consultation is confusing and alarming to residents.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Notwithstanding comments above, **Farningham Parish Council believe Option 1 of current proposals**, will minimise negative impacts locally whilst meeting most of the local housing need.

Farningham Parish Council strongly believe that a 'Baseline plus option' should be reconsidered as a reasonable response to need identified, in the Sevenoaks District context for a future consultation, however based on proposals within the existing consultation we have the following comments:

The future housing needs for Sevenoaks District to 2040 are specific, including a requirement for 59.4% 'truly affordable housing', reflecting high house prices in specific areas of the district, and 8.2% specialist 'HAPPI' (housing our ageing population: panel for innovation) homes for older residents, reflecting the increasingly ageing existing population. It is crucial to identify the right sites, in locations where need is identified and where delivery can **effectively** be achieved within the Local Plan period.

Sevenoaks DC should not therefore depend on Green Belt sites and/or National Landscapes (formerly knowns as Areas of Outstanding Natural Beauty) to meet their needs. Focusing development on large strategic sites in the green belt such as Pedham Place is a high-risk strategy that contradicts the National Planning Policy Framework, will require large funds to unlock, reducing the viability and speed of delivery of affordable homes, and infrastructure. Furthermore, the challenges of affordability are greatest around Sevenoaks Town, which should be their focus for affordable housing in the district.

Farningham Parish Council wish to object to the inclusion of any Green Belt sites or Natural Landscape sites in Plan 2040, until greater evidence suggests this is required through a revised Sustainability Appraisal, which provides evidence of required numbers, and that neighbouring authorities are unwilling to accept some of the required growth for Sevenoaks.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Notwithstanding issues raised above, in terms of consultation on specific site proposals, **Farningham Parish Council wish to formally and strongly, object to the inclusion of site MX-15 Pedham Place to be included** further in the '*Plan 2040, A New Local Plan for Sevenoaks District*' proposals as an appropriate site for mixed use development.

Farningham Parish Council believe that any perceived benefits from development of site MX-15 **cannot justify release from national Green Belt Policy**, or damage to the Kent Down Natural Landscape (Area of outstanding national beauty). In contrast we believe that development as proposed is inappropriate and in contrary to the National Planning Policy Framework.

Proposals for Pedham Place do not evidence the necessary '**exceptional circumstance**' for release of green belt land, and do not demonstrate minimum expectations for '*Sustainable Development*,' **that meets identified local need**.

Farningham Parish Council's reasons for objection to the inclusion of site MX-15 Pedham Place in Plan 2040 include:

The inclusion of Pedham Place, as a mixed-use housing-led development site would require that Sevenoaks District Council (SDC) seek to **release the site from the national Green Belt Policy**. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.

To justify changes to Green Belt boundaries, Sevenoaks District Council must demonstrate that it has **examined fully all other reasonable options** for meeting its identified need for development. As outlined above Farningham Parish Council believe there are further opportunities; to challenge the existing housing targets based on exceptional circumstances; to intensify development on existing brownfield sites, in sustainable locations; and to explore opportunities to meet some of the identified housing need through mutual agreement with neighbouring authorities.

Farningham Parish Council do not believe it is possible, viable, or desirable for Sevenoaks DC to consider Pedham Place as a potential development location as proposals as set out, do not meet the minimum requirements to be considered '**exceptional circumstances**' to warrant consideration for release from the Green Belt, or to meet the minimum requirements to be **considered 'sustainable development'** which is the golden thread which underpins the English planning system as defined through the current National Planning Policy Framework.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Farningham Parish Council do not agree that proposals as set out at Pedham Place will bring benefits to the wider community or infrastructure benefits based on identified current local need, nor do they outweigh the harm and destruction to the Green Belt and the Kent Downs National Landscape of the to consider inclusion in the Local Plan. Therefore, on behalf of the Farningham residents, we reject the inclusion of this proposal in the Local Plan for the following reasons:

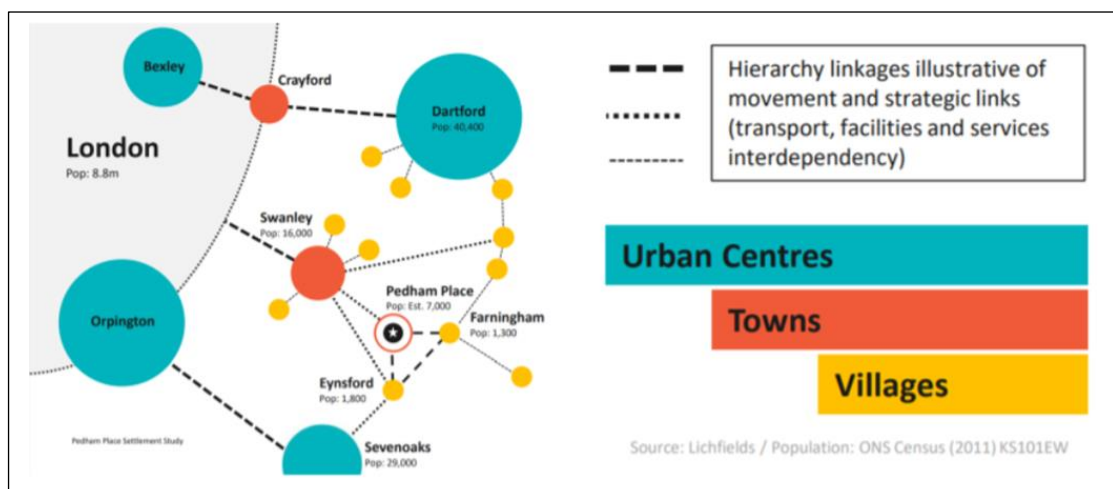
Protecting GREEN BELT Land

Pedham Place continues to strongly serve the original purposes for which the Green Belt policy was established **'to prevent urban sprawl by keeping land permanently open: the essential characteristic of Green Belts are their openness and their permanence'** NPPF para 142.

The NPPF (revised December 2023), confirms that the Government attaches great importance to Green Belts. Farningham Parish Council strongly believe that Pedham Place clearly meets the **5 Purposes of Green Belt** as set out in the NPPF, and that proposed development is contrary to NPPF in the following ways:

Purpose 1: "To check the unrestricted sprawl of large built-up areas."

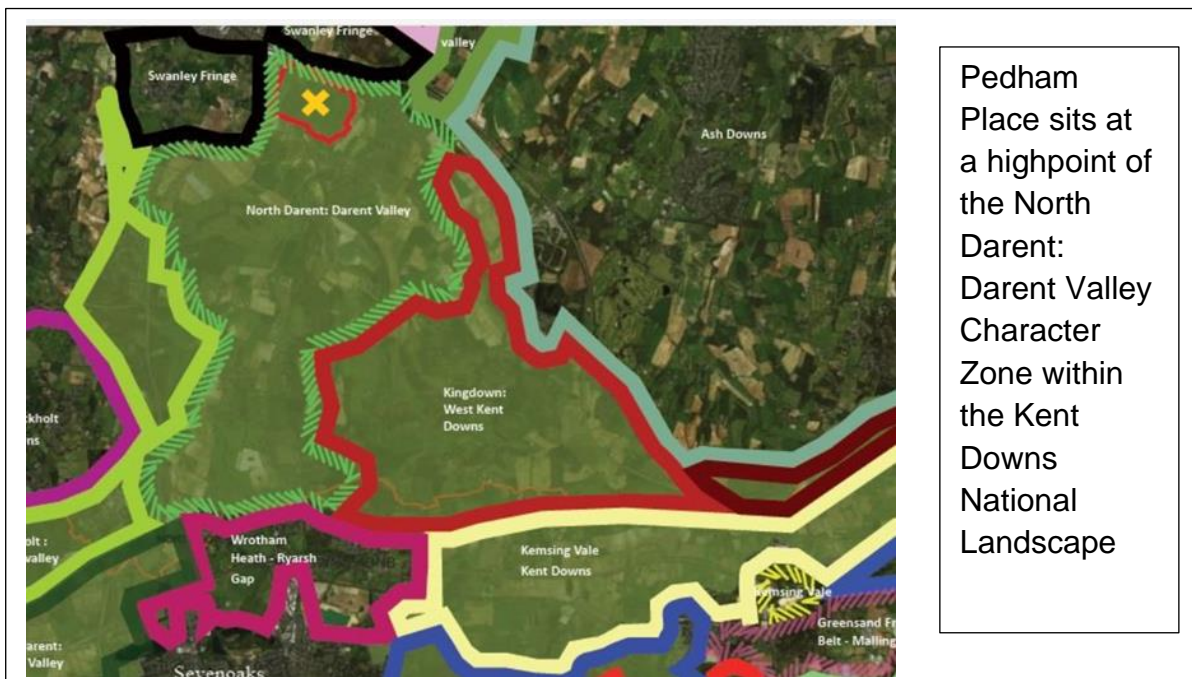
One of the purposes of the Green Belt is to prevent London sprawl. Pedham Place shares its immediate border with Swanley, which in turn abuts the London Borough of Bexley. Protecting the Green Belt at the edge of Swanley is vital to protecting the Sevenoaks District from London's urban sprawl. The extract below from the Pedham Place proposals highlights that a new settlement of 7,000 residents will engulf the adjoining villages of Farningham, and Eynsford, and merge with Swanley, extending London sprawl to the Darent Valley, which is an important character zone within the Kent Downs National Landscape.



Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Purpose 2: "To prevent neighbouring towns from merging into one another." Pedham Place has wrongly been described as Swanley; however, it sits across the rural parishes of Farningham and Eynsford. The proposals are for a standalone settlement of up to 7,000 new residents, equivalent in scale to Edenbridge or Otford, making it potentially one of top 5 settlements in the Sevenoaks District. This scale has the potential to function as a countermagnet to Swanley Town Centre rather than a catalyst for regeneration as suggested. The location of Pedham Place is physically disconnected from Swanley and therefore cannot be seen as a sustainable urban extension, yet it is too close to Swanley (2.5KM) to be distinct. The diagram above shows that the development of Pedham Place would effectively join Farningham with Swanley, undoubtedly threatening the separate identity of each. In addition, the development of this area also threatens the border with Eynsford and Crockenhill and could lead to the disintegration of separation between all four communities.

Purpose 3 "To assist in safeguarding the countryside from encroachment." Pedham Place is within the Kent Downs National Landscape (Area of Outstanding Natural Beauty) and part of a distinct North Darent, Darent Valley Character Zone. This would be severely damaged by the development of this site, as would views to and from Farningham Woods, which have been designated a Site of Special Scientific Interest. Development on the crest of the Darent Valley, at Pedham Place would negatively impact on the National Landscape, the Green Belt, the setting of the open countryside, and the views and setting of the SSSI at Farningham Woods.



Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

Purpose 4 "To preserve the setting and special character of historic towns."

Pedham Place proposals sit within Farningham rural parish. Farningham contains an important and strongly performing conservation area, the first of such designated in the Sevenoaks District in 1969. Farningham has an historical centre, which reiterates its identity as a separate community to the surrounding towns and villages, as a strongly rural parish. Any development at Pedham Place 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.

Proposals for Pedham Place have been developed around the principles of a 'fortified town' or 'ring fort,' which are completely alien to the traditional urban forms of Kent and in particular the Darent Valley. The centre of the proposed fortified town will be 1.5Km from Farningham, and will visually intrude into the Farningham Conservation area, which has recently been updated by Sevenoaks DC to reinforce the value of views up and down the Darent Valley and from and toward the village of Farningham. The proposed 'fortified town' has no appropriate precedent locally, and in contrast will fall and across the slope, dominating the Darent Valley, contradicting traditional urban forms which have grown along transport corridors and intersections with the River Darent.

Purpose 5: "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. Pedham Place is also the site of the historic Fort Farningham, designated a Scheduled Monument by Historic England, who note that 'Fort Farningham has remained largely free of alteration or renovation and survives comparatively well... including the tunnels beneath the rampart which are unique to Fort Farningham.' This important local Heritage Asset, of national significance is now at threat of damage through inappropriate development at Pedham Place.



Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

In contrast to the important benefits set out above which Pedham Place brings in protecting and reinforcing the purpose of Green Belt land, **Farningham Parish Council do not agree that proposals as set out at Pedham Place will bring benefits to the wider community or infrastructure benefits based on identified current local need.**

Therefore, on behalf of the Farningham residents, we reject the inclusion of this proposal in the Local Plan for the following reasons:

THE INABILITY TO ACHIEVE SUSTAINABLE DEVELOPMENT AND TO EVIDENCE 'EXCEPTIONAL CIRCUMSTANCES'

Farningham Parish Council fundamentally disagrees that the benefits proposed by the promoter under the exceptional circumstances at Pedham Place would benefit Farningham or its residents, and/or reflect or meet locally defined need. The purpose of the National Planning Policy Framework is to contribute to the achievement of sustainable development; 'meeting the needs of the present without compromising the ability of future generations to meet their own needs.'

Achieving sustainable development requires the planning system to achieve **economic, social, and environmental objectives**, achieving net gains across each. For Pedham Place to be considered as a suitable site for future development, site proposers must prove that it is possible to achieve sustainable development in this location, and that the potential losses and detriments outlined above can be offset by the benefits of the proposal examined below. Farningham Parish Council believe the exceptional circumstances proposed by the promoter are neither fully evidenced nor justified, and so do not meet the minimum expectations to justify changes to Green Belt boundaries. Of the new infrastructure as stated by the promoter in the draft local plan:

- (i) **Meeting Housing Needs:** proposed Garden Community to provide 2500 homes, including 1000 'truly affordable homes' in a 20-minute, net zero neighbourhood.

Pedham Place is not included within the 43 proposals across England for Garden Towns and Garden Villages supported by Government, and announced by the Department for Levelling Up, Housing and Communities, so it is unclear why proposals for Pedham Place claim to for a garden community. Furthermore, The Town and Country Planning Association are the custodians of the 10 Garden City Principles which they have redefined for the 21st Century, and which include; Land value capture for the benefit of the community; community ownership of land and long-term stewardship of assets; and development that enhances the natural environment. None of these appear to apply to Pedham Place, and indeed there is no reference to how the development will be managed and funded in current plans.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

The proposed new homes at Pedham Place do not reflect need identified in Farningham or in neighbouring villages. The proposed scale of new homes is disproportionate to local need.

The quality of proposals is not proven to be exceptional, rather they commit only to Future Homes Standards, which will be required by Building regulations in advance of development starting. Reference to the 20-minute Neighbourhood Principles set down by the Town and Country Planning Association, are taken out of context, referring to the eight design features, but not to the ten principles for success which accompany them. Proposals reduce the amount of green space available, the proposed secondary school is at the edge of proposals, not 'at the heart' as envisaged in a 20-minute neighbourhood, and it is extremely unlikely that all needs can be met locally.

(ii) Contributing toward required Sports Facilities and amenities

It is unclear what relevance the proposed WASPS Rugby Stadium and associated facilities have to identified local needs or to achieving sustainable development. Farningham residents are well served by nearby leisure facilities in Brands Hatch, Sevenoaks, Hextable, and Dartford, with the refurbished White Oaks Leisure Centre in Swanley being recently completed. Farningham benefits from its existing cricket club. There is also no identified need for additional community space within existing villages who are well served by village halls and outdoor spaces.

(iii) Delivering additional Healthcare Facilities

Farningham already has a GP practice and dental surgery, with a further physiotherapy practice all on Farningham High Street. Braeside Surgery, Farningham and Devon Road Surgery in South Darenth are currently consulting on proposals to merge to achieve greater effectiveness.

Dartford, Gravesham and Swanley, Health and Care Partnership includes Farningham, and works collaboratively as part of the Kent and Medway Integrated Care Board to plan for future health needs of the area. Farningham Parish Council are not aware of any need identified for a new primary healthcare facility to meet any local need identified in the Farningham area. Furthermore, funding from NHS England for new GPs will follow population need after it has arrived, there would be an inevitable time lag between new homes being built and a healthcare facility being provided. The current NHS England 10-year plan promotes a new model of care based on social prescribing and wellbeing, and the development of health and wellbeing hubs of a much greater scale than that envisaged for Pedham Place. It is therefore highly unlikely that a new facility at Pedham Place will be funded within the Local Plan period. Therefore, it is likely that new development at Pedham Place would therefore place an additional burden on the existing facilities in the local area, which are all currently over capacity.

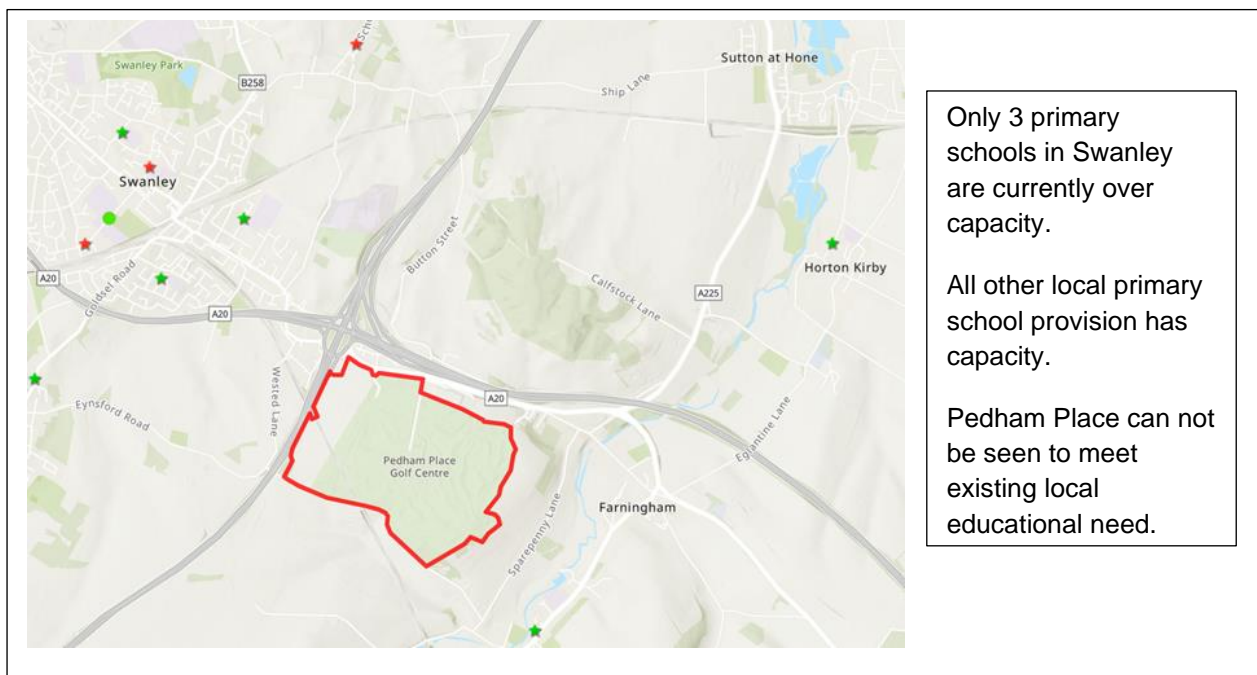
Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

It is unclear whether or not the site promoter has held discussions with Kent and Medway Integrated Care Board, if they had they would also likely be informed that capacity at Darent Valley Hospital is also full, and so new development is likely to need to make a financial contribution to both primary and secondary healthcare in the local area.

(iv) Providing additional **Schools places to meet local need.**

Proposals for Pedham Place include two new, two-form entry primary schools, with a total capacity of 840 pupils, and one new six-form entry, secondary school with capacity for 1170 pupils. Quotes in the Pedham Place proposals, allegedly made by Kent County Council state that unless Pedham Place comes forward as a mixed-use development site, then no site for a secondary school will be achievable to serve the communities to the north of Sevenoaks.

Using the Department for Education, Pupil Yield tool for new development, only 625 new primary school places and 325 new secondary school places will be generated by new development when it is fully complete. This suggests that there is an excess of 205 primary school places and 845 excess secondary school places being provided. Figures within the education section of the Pedham Place proposals highlight that there is capacity within most of the surrounding primary schools. Orchards Academy, Swanley as the nearest secondary school is currently working at only 65% capacity. Furthermore, it is unclear why the site at Pedham Place is fundamental to Kent County Council education plans, as Oasis Academy, Hextable, (4 KM from Pedham Place) was closed in 2016 due to falling student numbers. At that time, Kent CC stated that 'they would retain the site for future use as demand for secondary school places increased again.' Proposals for education at Pedham Place are not justified and do not support existing need.



Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

(v) Employment through provision of offices and local retail

Shops in Farningham High Street have been closing, including Farningham Butcher which has closed in the past year, and Farningham Village Store which was granted change of use by Sevenoaks DC to a house because of the lack of demand for retail provision. We therefore reject that there is a requirement for retail provision to meet existing need. Local communities are already well served by the shopping hubs in Bluewater, Dartford, Sevenoaks and Swanley. Proposals for up to twenty shops in Pedham Place are unrealistic. Reference to the success of mixed-use settlements such as Nansledan or Poundbury have only been achieved under the philanthropic insistence of its landowner King Charles the Third. Successful new town centres also place their facilities close to existing or new infrastructure, in contrast to Pedham Place which will in effect be a large cul-de-sac. Suggestions of a supermarket will detract from the viability of Swanley Town Centre and contradicts the principles of sustainable development.

Whilst the provision of office space and home working may generate limited employment, this 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 provides no benefit to existing communities. This is the creation of a new dormitory settlement, not an enhancement of the existing village of Farningham and neighbouring villages.

Farningham Parish Council 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) Provision of Open spaces for the benefit of the community

Farningham Parish Council refute the suggestion that the developers of Pedham Place, will create nett new open spaces and biodiversity net gain, when so much of the Green Belt and the current open spaces will be destroyed. It is also unclear how concreting over so much of the National Landscape with hard surfacing will affect surface water run-off, and potentially lead to flooding of the settlement in the Darent Valley, specifically Farningham and Eynsford where the River Darent flows adjacent to many homes. The River Darent is an important chalk stream, and the environmental impacts of proposals on the valley must be carefully understood before development considered.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

(vii) Proposed Park and Ride facilities to support local infrastructure.

The plans for a park and ride scheme will add to the congestion on the roads on the M20, M25, 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 currently, and the ability to create one along the B1273 is unviable. Therefore, proposals for these facilities would bring no local benefit, however have the potential to add significantly to local congestion and worsen air quality for residents of surrounding communities.

(viii) Proposed enhancement of the Kent Downs National Landscape

Farningham Parish Council strongly deny the claim that proposals at Pedham Place will enhance the Kent Downs National Landscape (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.

The Countryside and Rights of Way Act 2000 states that the Local Planning Authority should conserve and enhance National Landscapes. The NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and National Landscapes, which have the highest status of protection in relation to landscape and scenic beauty. This proposals for development at Pedham Place do not enhance or conserve the character of the landscape, rather it proposes an alien new settlement which could potentially ruin the character of the beautiful Darent Valley.

(ix) Proposed improvements to Public Transport

Farningham Parish Council refute the suggestion that the development of Pedham Place will enhance public transport connectivity. There is no possibility of a rail station to directly serve Pedham Place, and therefore it is dependent on cars and limited public transport options. Connections to Swanley Station will be problematic and dependant on the M20/M25 interchange and the capacity of the existing B2173, which are already beyond capacity. The inclusion of a park and ride on the site, will attract further cars to the site, whereas cycling and walking are restricted by both topography and the need to cross the busy Swanley Interchange. Kent County Council are currently reviewing existing bus services in the area, and therefore an additional service to the site is unlikely without significant subsidy, which again will challenge site viability. Walking and cycling to the site is potentially dangerous and only suitably for able body persons.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

(X) Impact of Site Access on local traffic congestion

Access to the Pedham Place site is very restricted, with access only viable from the A20 to the north of the site. There is a maximum of two potential access points to serve the proposals. Proposals will therefore be overly dependant on access to and flow along the A20, close to its juncture with the M20 / M25 interchange at Junction 3 / 1, Swanley Interchange. These access points could bring many thousands more car movements at peak times, where the existing infrastructure is often already stressed.

National Highways have published a series of route strategies in May 2023, including one focusing on 'Kent Corridors to M25' and the M25, London Orbital. The reports highlight that the M25 as it approaches the Dartford Crossing (A282) is amongst the locations where most people have been killed across the national network in road traffic accidents. Furthermore, the report highlights that M25 and sections of routes leading into London, have the highest rates of accidents for pedestrians, cyclists and horse riders in locations where local traffic interacts with strategic traffic.

Continued delays to the proposed Lower Thames Crossing, planned east of Gravesend, which would help alleviate congestion tailing back from the Dartford Crossing up to Swanley Interchange, means that improvements are unlikely in the area until the early 2030's, at best midway through the Plan 2040 period.

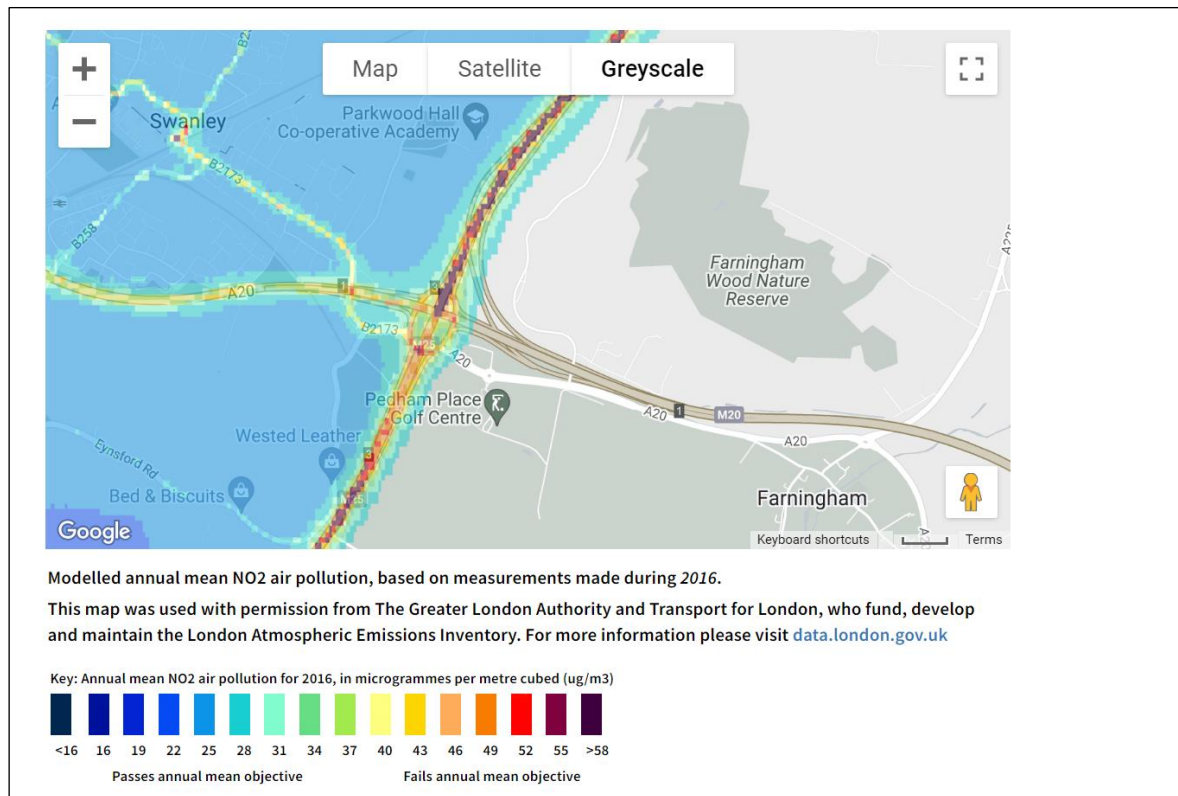
Kent CC Highways recognise that the A20 between Pedham Place and Brands Hatch, is amongst the most dangerous in Kent, with numerous fatal collisions per year. Fatalities along this stretch of road are increasing, despite various traffic schemes which have been tried to reduce the dangers. Substantial development of Pedham Place will only exacerbate the situation, with the potential of making the A20 significantly more dangerous and more congested.

Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

(X1) Negative **IMPACT ON AIR QUALITY.**

Farningham already suffers from elevated levels of air pollution due to existing traffic congestion and nearby M25 and M20 motorway roads. Both NO_x emissions and CO₂ emissions are incredibly high, which affects health (physical and mental), wellbeing and life expectancy of residents. Air quality in Farningham is already at dangerous levels, more vehicles using the A20 will only add to the air quality issues.

The map below highlights the rates of NO₂ air pollution along the M25 corridor, which highlights the stretch from Dartford to Junction 3 with Swanley is amongst the most polluted nationally and fails requirements for acceptable air quality. Sevenoaks have a duty of care to ensure that location for development that it supports will be safe for residents who will live there. Future residents of Pedham Place will live adjacent to the M25 / M20 / A20 junction at Swanley Interchange, which is an unsafe location for air quality. The situation here is unlikely to improve until the Lower Thames Crossing has been completed, which may alleviate some of the M25 congestion, however completion of this project has not yet been confirmed and will likely be toward the end of the Plan 2040 period. Furthermore, the Government have delayed the ban on selling new combustion engine vehicles until 2035, which again means opportunities for improving air quality have been pushed toward the end of the 2040 Local Plan period.



Farningham Parish Council response to SDC Plan 2040, Regulation 18 Consultation, Jan 2024

(X11) Negative impact on **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 function as a natural absorber of rainwater. 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, thirty-three 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).

CONCLUSION

- Farningham Parish Council wish to strongly object to the inclusion of site MX-15 Pedham Place in any future options for housing or mixed-use development.
- Any perceived benefits from development of site MX-15 cannot justify release from national Green Belt Policy, or damage to the Kent Down Natural Landscape.
- Proposals for Pedham Place do not evidence the necessary 'exceptional circumstance' for release of green belt land, and do not demonstrate minimum expectations for 'Sustainable Development,' that meets identified local need.