Information has been gathered from the reports prepared by Farningham Parish Council, HGH Consulting (the crowdfunding advisor), and Laura Trott MP’s email and experts sharing their example submission response and a list of points to raise in your survey response has been created from these in blue below to phrase/refer to as you wish to complete your opposition to Pedham Place Settlement progression.

The pop-up session at Farningham Village Hall on Thursday 4th January 2024 raised a few points to note that aren’t obvious when you go to complete your survey response:

* The ability to submit a response to the survey by **all parties in a household**, even babies. There’s a category with 0+ years and that means everyone in the household can have a say.
* All comments in the boxes are to be **unique and not copied and pasted** from the list of points below. Any such copied and pasted responses will be counted as 1 vote only. (That said, there’s a limited time in which to add your comments and it is recommended you prepare objections in a word document to then copy and paste them in to avoid the problem of the form timing out.)
* **Referencing** to the site/sites is to be done with planning points only made in the comments box.
* Referring to planning points of objection in the comments box holds **more weight** than just a vote (i.e. for Option 1).

Here are the steps to walk you through online process, page by page (it is detailed but please don’t be put off and ask if you need help):

1. Click on the url (<https://engagement.sevenoaks.gov.uk/strategic-planning/plan2040/>) or scan you can scan this barcode to complete the survey:



1. Complete information and ensure you agree to your response being made public.
2. To contest Pedham Place, choose **Option 1;** and
3. Complete the first comments box with a reason why you’ve chosen this Option 1 **only** (not planning reasons at this point) and, if you wish, you can make reference to not having a “Baseline” option and additionally this seems to be the only option to contest “**Pedham Place MX-15**” – type this reference. If you are not aware of sites you can offer SDC, select “no”. N.B. no reference to the WASPS stadium here.
4. Choose site or policy – choose site – text version so you can see the list on the next page. From the pull-down menu “site text option” and continue.
5. On the next page, ensure you select “Stand alone settlement – Pedham Place (Option 2)” from the list and continue. Please note the title of this is not to be confused with your vote for Option 1 – the label could be misleading. You are voting for Option 1 by this time on the form.
6. Then choose your opinion and “Do you have any further comments” is where you put the site planning reasons (no personal loss reasons, e.g. house value, loss of views, rumours or hearsay) to contest this site and type in specifically to “**Pedham Place (MX-15)”** in the comments box. Do not refer to the stadium here. We cannot contest the WASPS stadium as that is going through a separate process even though it is linked to Pedham Place. Use the list below (Annex 1) on this document to choose your planning reasons (not personal ones about house values, loss of views, reasons for the housing needed, rumours and hearsay) why this development should not proceed (**please use your own words** to avoid risk of discounting our responses). If you wish, you may also add in that **you would like your objections to this development to be represented by Farningham Parish Council’s response**.
*You do not have to detail all points listed in your comments box but do pick the ones to describe yourself that you are most drawn to for your response****. Some objections will require specialist knowledge and are there for those that understand them to follow up.***
7. It is not necessary but, if possible, please respond on Policy also on the next page using Annex 2, below. Choose the Policy you might want to comment on. Of particular interest is Policy ST1 (A balanced Strategy for Growth) and Policy SL1 (Sports and Leisure). You will need to do each separately. Some points for consideration are in annex 2 and 3.
8. **Repeat** this form for all occupants in your home as **responses from all household members** are encouraged and there is an age category from 0yrs old. Remember **not to duplicate responses identically as they will be disregarded or counted as one vote if they are copied**.

If you need help, contact Su Hewitt (email: su.hewitt1@gmail.com or M: 07931 588889).

**DATES FOR YOUR DIARY:**

* **Tuesday 9th January** at 4:30-7:30pm – SDC Pop-Up at Sevenoaks Leisure Centre, Buckhurst Lane, Sevenoaks, TN13 1LW.
* **Thursday 11th January** by 11:59pm – deadline to submit your survey response.

**WHAT ELSE YOU CAN DO:**

* Donate to the crowdfunding to pay for the legal report that was commissioned to help help prepare this information: <https://www.crowdfunder.co.uk/p/no-pedham-new-town/backers#start>



* Write to local MP Laura Trott: <https://www.lauratrott.org.uk/contact>
* Write to your local councillor: <https://cds.sevenoaks.gov.uk/mgMemberIndex.aspx?bcr=1>
* Write to your local Parish Council clerk expressing your concerns.
* Join the NOFarninghamNewTown Facebook page: <https://www.facebook.com/groups/197889910908245>
* Join the [www.beesnotwasps.org](http://www.beesnotwasps.org) website emailing list:



**Annex 1**

**POINTS TO SELECT FROM FOR INCLUSION IN YOUR COMMENTS BOX (YOU DO NOT HAVE TO INCLUDE ALL POINTS BUT SELECT AT RANDOM, PLEASE**

PLEASE REPHRASE AND REORDER FROM THE LIST OF SUGGESTIONS THAT WILL ALL BE MOST RELEVANT BELOW OR THEY WILL BE DISCOUNTED AS A VOTE:

* 1. Green Belt - Both areas perform strongly to meet the 5 purpose criteria for the retention of **Green Belt**, which states:
		1. preventing urban sprawl;
		2. preventing neighbouring towns merging into one another;
		3. assisting in safeguarding the countryside from encroachment;
		4. preserving the setting and special character of historic towns, and
		5. assisting in urban regeneration by recycling of derelict and other urban land, i.e. serves well by providing a golf course.

Pedham Place is not sufficienty distanced from either Swanley, Crockenhill, Eynsford or Farningham to create a **distinct settlement**. The proposed scale of Pedham is likely to cause the villages to merge with Swanley into an urban sprawl.

* 1. **Green belt** – to consider more carefully the assumptions about the amount of development before the release of Green Belt and/or loss of National Landscape.
	2. Recent change to the **National Planning Policy Framework** have been introduced to further protect Green Belt sites, and to reduce the impact of mandatory housing targets. Sevenoaks DC do not need to use this site to be compliant with national policy.
	3. **Green Belt** – the development would have an adverse effect on the nearby land and woodland being part of Area of Outstanding Natural Beauty (AONB), now known as National Landscape, and Sites of Specific Scientific Interest (SSSI), specifically Farningham Woods, therefore potential damage outweighs potential or perceived benefits of the development. There are two reports: one from Arup for SDC said it was assessed as performing strongly against the National Planning Policy Framework (NPPF) purposes for including land within the Green Belt. The other is a contradictory report commissioned by the land promoter, which appears biased. Pedham Place is an important contribution to the Green Belt. CPRE (Campaign to Protect Rural England) feedback also applies.
	4. **Environment** - there is too much air pollution from the M25, affecting the Pedham Place and WASPS proposed sites. 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 Dartfrod River Crossing, backing up towards Junction 4. The topography of the Darent Valley makes it difficult for the pollution to escape. This is dangerous to health for those living here and would be even worse for people living in, or visiting, the proposed development.
	5. **National Landscape** - the land is “National Landscape” (the new name for AONB) and the NPPF presumes against major development in National Landscapes. Separate from Green Belt protection. Pedham Place is at a high point at the edge of the Kent Downs, and is visually prominent within the Kent Downs.
	6. Site would conflict with **statutory purposes of the National Landscape** designation (as per Countryside and Rights of Way Act 2000).
	7. **Housing requirements** – SDC does not need Pedham Place in the Local Plan. The consultation acknowledges that Option 1 (i.e. without Pedham Place) “approximately” meets the District’s needs, and is supported by a greater focus on the advisory rather than mandatory housing targets.
	8. **Housing requirements** – there are specific needs for Sevenoaks District including the 8.2% of specialist ‘HAPPI’ (Housing our Ageing Population: Panel for Innovation) homes for older residents to reflect the increasing ageing population. The right site is unlikely to be one with a stadium where elderly residents would be more sensitive to noise from a stadium. The 59.4% of ‘truly affordable housing’ and the right site needs to be identified for delivery of these requirements effectively. High costs of developing Pedham Place are likely to mean that 40% of affordable housing will be unviable, which in turn defeats the objective of the strategic housing approach.
	9. **District’s needs** – Pedham Place and stadium are not required to meet local needs. What is proposed is disproportionate to the local need.
	10. **Garden Community** - Do not believe the Pedham Place is a proposed **Garden Community**. Pedham Place is not listed by government as a potential garden community site. There are no indications of **Garden City Principles** in proposals, specifically ‘land value capture’ for the benefit of the local community or enhanced standards for management or higher design quality provisions.
	11. Do not demonstrate they can meet minimum expectation for **‘sustainable development’** and they cannot justify **‘exceptional circumstances’** to substantiate the criteria to release the land from national Green Belt Policy with reference to the National Planning Policy Framework. Pedham Place is part of the Parishes of Eynsford and Farningham and would not be a sustainable development. Not sustainable due to being dependent on the **use of a private car**, which is **at odds with the national planning policy**. The provision of **public transport** would not be viable due to the road structures. Stations are too far away and cannot sustain the capacity to accommodate a development of this size with the leisure facilities it claims to provide. Expense of these changes may prohibit the possibility of the promises and more detail on this is required to make a judgement on that. The financial transparency and assessment would be useful to look at. A stadium requires so much transport as would the housing. **2500 homes not large enough to be self-supporting.** Needs to be twice that size to provide local shops, services, community facilities and a secondary school. More numbers would increase the unviability due to infrastructure demands and would increase the burden on existing towns and villages.
	12. **Sports Facilities and amenities** – there would be no local identified need for a sports stadium as it is served by plenty of nearby sports and leisure facilities, including nearby Brands Hatch, Hextable facilities, White Oaks Leisure Centre, a Rugby Club in Swanley and cricket clubs in Eynsford and Farningham. The golf course facility also provides an important recreational facility and this is not unprofitable and would be lost if the Pedham Place development went ahead. Furthermore, in contrast to other local golf courses, Pedham Place is very well drained, so playable at all times of the year. The replacement is not necessary.
	13. **Pollution** – light, noise and sound pollution from the stadium would threaten wildlife and further erode the dark sky qualities of the National Landscape. Light pollution would also affect the local livestock on farmland negatively and there are lot of local businesses whose livelihoods depend on the wellbeing of their animals. As the WASPS have a small audience, I understand the stadium would be used for entertainment also and that noise is highly likely to be very disturbing to the local community. It is bad enough when there are events held at Brands Hatch but at least they’re not at anti-social hours. Concerts would interrupt the peace and enjoyment of the area.
	14. **Traffic** - Junction 3 of M25 is already at capacity and would not be able to cope with any extra traffic. Traffic - The A20 is extremely busy at times, including race days at Brands Hatch. B2173 (London Road, Swanley) is extremely busy in rush hours to get to Swanley Station.
	15. **Traffic** - the increase in traffic between Junction 3 and Swanley is unacceptable, bearing in mind the struggles there are now, particularly at rush hour.
	16. **Traffic** - the increased possibility of large lorries travelling through the neighbouring villages.
	17. **Traffic** - there are insufficient plans for adequate public transportation for the rugby stadium or housing. The railway stations are too far away from the sites and there are hardly any buses. The report suggests solutions that would not work due to the road sizes and availability of land that undermines the proposed solutions. The roads and Junction 3 just cannot cope with existing volumes of traffic now, even before any development takes place.
	18. **Infrastructure** – the topography of MX-15 means that it is not user friendly with walking or cycling due to the steep nature of the area and fast traffic. A cycle route would be required and subway under the M25 to access Swanley Station. Other routes have a shortage of pavements for safe pedestrian access. This makes the site unsustainable.
	19. **Infrastructure** – inadequate utility provisions like water and wastewater management, communications, healthcare, education and community facilities that support new and existing residents.
	20. **Environment** – flood risk as the golf course currently absorbs rainwater. Developing the land would involve hard surfaces leaving the water as surface water run-off, thus posing a serious risk of flooding downhill, from Farningham Hill to the River Darent with increased risks to the houses that already flood there. This also threatens the Darent Valley chalk bed river, one of the last 200 in the world and which needs to be protected.
	21. **Environment** – hazards – the pylons represent a very significant danger to public health since the high voltage power lines have Electro-magnetic Fields (EMF) and the development would be built next to them and that would cause health issues. Burying the pylons is not enough. They need to not produce an EMF.
	22. **Environment** – the hazardous waste that may be contained from when the golf course was a landfill site requires investigation and remediation to fully ensure that this will not injure anyone or AONB, SSSI, chalk bed and local flora and fauna. There are wild orchids on the site and wildlife that needs to be protected.
	23. **Heathcare** – there is no provision for a healthcare facility of adequacy at Pedham Place and the stadium. Hospital facilities are stretched now and added development causes more demand. The proposal does not cater for enough of the requirements that development of Pedham Place and a stadium would need and it would provide more cost than benefit to the surrounding areas.
	24. **Education and Schooling** – there is a redundant school building in Hextable that could be refurbished cheaper than putting in new schools. Comment on the level of requirements and provisions and whether that would even provide anything to local areas in addition to what would be needed for Pedham itself.
	25. **Employment and Economy** – shops have closed in many local villages, including Farningham and Eynsford. There is **no requirement for shops** in the area and more shops here would detract from the use of Swanley for shopping.
	26. **Design –** there will be a loss of some of the open spaces that local people use in Crockenhill, e.g. Petham Park to make space for the stadium, but that stadium would not be used in the same way by local people.
	27. **Design –** open space and green lungs between settlements. The proposal of Pedham Place and the Stadium would reduce the availability of these open spaces and green lungs between settlements (OS1 – Open Space and Recreation policy).
	28. **Wildlife** **& Forna** – wild orchids, skylarks breeding, bats, giant (“Roman”) snails all need protection.
	29. **Historic Environment** – it would harm the settings of Fort Farningham Scheduled Monument, Farningham Conservation Area, Eynsford Castle and many listed buildings within the village. The Fort is a historic landmark in need of protection.
	30. **Gladman Developments & Ramac Group** – both companies known for doing deals with landowners and trying to manipulate the planning system to best serve the purposes of making things look good on paper. They then sell the land on to developers. This is contrary to the **Garden City Principles** which the site claims to be.
	31. **NPPF** – the release of this information on 19th December 2023 was far later than the start of the consultation period on 23rd November 2023. A 78-page document to review with significant implications on the proposal of this site was then required to be reviewed with relevance to the Plan 2040. The implications of these changes means that Councils do not have to review Green Belt boundaries. This is a significant change affecting Pedham Place in terms of the necessity to review this site.
	32. **Process** – the information was confusing to digest and the survey form constructed in a way that caused misunderstanding. Those that live in the area are more equipped to comment as they know the area well in their own district. The weight of the votes should be more for those in the same district as the development when referring to the development they are living in.
	33. **Plan 2040** – does not reflect NPPF updates and relevant changes and so it is unlikely to meet the “Test of Soundness” as set out in the National Planning Policy Framework.
	34. **Target for Housing** – in light of the **NPPF**, the target should no longer be seen as “**mandatory**” but “**advisory**” instead and this would invite Sevenoaks District Council to identify what is possible within the exceptional characteristics of Sevenoaks District.
	35. **Views** – development is in an elevated location that would be visible from important viewpoints within the National Landscape, Green Belt and SSSI, particularly those associated with the Darent Valley and Historic Roman Villa.

**Annex 2**

**Responding on Policy**

Select: ST1 (A Balanced strategy for Growth)

1. 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 (October 2023).
2. Sevenoaks DC proposed Policies ST1 (A Balanced Strategy for Growth) is based on meeting a mandatory housing target of 10680 within Plan 2040. In line with revisions to the National Planning Policy Framework, this target should no longer be seen as mandatory, but rather advisory, which opens up an opportunity for SDC to identify what is possible within the exceptional characteristics of Sevenoaks District, including 93% Green Belt.
3. Land allocations Options 1 to 3 as proposed in Policy ST1, should be reconsidered, with alternative options which do not require release of Green Belt, and / or National Landscapes (Area’s of Outstanding Natural Beauty) sites within the Sevenoaks District put forward for consideration.
4. The Baseline Option should be reconsidered as a reasonable response to identified need in the district, ‘approximately meeting need’.
5. Sevenoaks DC should seek to collaborate strategically with neighbouring authorities, specifically Dartford BC to help meet future housing need through mutual agreement.
6. Sevenoaks DC should seek to increase densities of development on available sites such as Sevenoaks station site, to put housing in the most sustainable locations where it meets identified needs.
7. Sevenoaks DC should consider a more strategic approach, including direct development to hel meet its extraordinary requirements for up to 60% affordable housing. This is unlikely to be met through mainstream development alone.
8. Sevenoaks DC should look more strategically at how it can deliver its specialist housing for older people, including through direct development, or designating its own land holding for redevelopment for specialist housing in appropriate locations near existing facilities and public transport.

**Annex 3 policy SL1 (Sports and Leisure)**

Select: Proposed Policy SL1 (Sports and Leisure Facilities)

The rationale for the proposal for a cluster of world class sporting facilities to the North of Sevenoaks District in unclear and is not evidenced.

This proposals does seems to contradict the detail of the proposed policy which states; that such facilities will only be considered where they;

* meet an identified need;
* are proposed in a sustainable location;
* make a valuable contribution to the health and wellbeing of the local community.

There is no detail or evidence of need for any specific world class sporting facility in the north of Sevenoaks district. Residents in the northern rural parishes and in Swanley Town 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 is an excellent facility. Local villages all benefits from existing cricket clubs, and community spaces

Access to the currently unspoilt Darent Valley walks are the greatest sport and leisure asset in the Sevenoaks district and as such should be protected rather than threatened by new facilities where evidence of need is not apparent.

It is unclear what relevance the proposed WASPS Rugby Stadium and associated facilities have that identify local needs or contribute toward achieve the wellbeing of residents locally. The inclusion in this consultation has been confusing for residents, and it should not be considered further.

In contrast, Pedham Place Golf Club and range provides an affordable leisure and training option for local children and adults alike, and should be protected.