

Policy EMP2 inclusion of site SWAN17 - Land at Petham Court in Crockenhill for a 110,000 sq/m Wasps stadium, hotel, sport, leisure and medical.

Crockenhill Parish Council is unequivocally opposed to the proposal for the construction of the 28,000-capacity Wasps stadium on a site entirely within this small parish of 1,600 residents.

The Parish Council maintains that this proposal is wholly unsuitable for a rural village and should be excluded from consideration in the Local Plan.

Crockenhill Parish Council has serious concerns as to why the Local Plan is seeming to promote a scheme which is so nebulous, lacking detail and incompatible with village life and the surrounding countryside.

Our submission is that this site should be removed from the Local Plan. Our arguments will be based on eight planning themes;

- 1. Deliverability & Viability**
- 2. Impact on the landscape**
- 3. NPPF Environmental Objective**
- 4. No viable site Masterplan**
- 5. No identified need for this industrial allocation**
- 6. Lack of a Transport Impact Assessment**
- 7. Contrary to Policy EMP2**
- 8. Contrary to Policy HW3**

1. Deliverability & Viability

For industrial land (and other non-residential uses), the NPPF focuses on ensuring that planning policies are realistic, deliverable, and do not undermine the viability of the plan as a whole.

Allocations for industrial development in Local Plans need to be based on robust evidence that the proposed developments are viable and have a realistic prospect of being developed within the plan period.

The allocation of this site in the Local Plan fails in this respect.

In undertaking a robust assessment of its viability, we feel that the Local Planning Authority has failed to consider the context in which this proposal came forward.

The following timeline shows clearly that the proposal by Wasps was highly speculative, and that things that have happened since, have made the proposal surplus to requirements.

Wasps Stadium Timeline

October 2022: Wasps RFU entered administration and were suspended, leading to relegation from Rugby's Premier league and all 167 staff being made redundant. The owners Wasps Holdings Ltd had built-up reported debts of around £100million following a move to 32,609-seat stadium in Coventry in 2014.

December 2022: The assets and IP of Wasps Holdings Ltd were secured by a consortium led by Christopher Holland. Wasps exited administration with the intention of entering the club back into a top-level league.

May 2023. The BBC reported that Wasps owner Christopher Holland had also become the majority shareholder in Worcester Warriors. This was another big club that went into administration with debts of more than £2.5m in September 2022. According to the Companies House website, the stake of the original owners, Atlas Group, had been bought by Holland's firm Loxwood Holdings. Loxwood had previously given a loan to Atlas that had not been repaid..

May 2023: Wasps' ability to compete in the Championship (second division) for the 2023-24 season was rescinded by the Rugby Football Union due to a failure to meet a deadline for confirming commitments. If they had continued as a club, they would be placed at the bottom of the English rugby union pyramid (league ten).

October 2023: Wasps announced in a statement on their website that they were working in partnership with Sevenoaks District Council to find a new stadium in Kent.

November 2024: Wasps owner Christopher Holland said the club had secured a 10-year option on private land south of Swanley in Kent (Pedham Court Farm owned by Swanley Town Council).

Late 2024: Wasps and Worcester Warriors (both now controlled by Christopher Holland) applied for places in the new 14-team rugby League 2 (Championship) for the 2025-26 season.

January 2025: An update on Companies House confirmed Wasps Holdings Limited had been formally dissolved following the completion of the liquidation process.

April 2025: The BBC reported that Worcester Warriors had been selected to compete in the new Rugby Championship for the 2025-26 season, having passed rigorous financial tests. They are currently playing home games at their Sixways Stadium in Worcester. In an interview with the BBC Hollands stated that his priority was now to establish Worcester as one of the top English clubs.

Wasps however were not selected for a place in the Rugby Championships The limited company has been dissolved. They have no teams competing in any league. They do not exist as a legal entity in any form.

There have been no updates on the Wasps website, nor its social media channels since December 2024. Wasps members who live in the Crockenhill area have heard nothing from the club for over a year.

To coin a sporting phrase, what is clear from the above is that Christopher Holland was playing with two balls in the air. As the above timeline shows, he bought two ex-Premiership

rugby clubs that had both entered administration. He was jointly exploring which of the two had the best chances of being readmitted to the rugby pyramid at a high level.

With debts of £2.5 million (as opposed to £100million) and with rights to a readily available stadium (as opposed to no stadium), it was clear that Worcester Warriors was the team that Christopher Holland was prioritising.

That would explain why, since the announcement of securing an option on the Petham Court site, Wasps has been invisible.

None of the landowners we have spoken to have ever met a representative from Wasps rugby club. They have only had meetings with representatives of Swanley Town Council (the main landowner). In the view of Crockenhill Parish Council, STC members were clearly 'acting on behalf of the Wasps' which raises issues around transparency and conflicts with serving the community.

No community consultation has taken place. No one from Wasps has ever approached Crockenhill Parish Council to discuss the plans. Wasps has not submitted any detailed Masterplan for the site. Wasps has not submitted any information to support the viability of the proposal. Wasps has not commissioned even the most basic of landscape or transport impact assessments.

According to Swanley Town Council (freedom of Information request) Wasps was given a 10-year option on the part of the site that STC owns. However, as of November 2025 Wasps has failed to even register a Unilateral Notice with the Land Registry for the site (which is standard practice to protect its interests).

The situation was confirmed in a letter to Crockenhill Parish Council from the local MP Laura Trott (4/12/25) in which she stated: "Although I know the rugby club have a long-term option on this site, the last time I approached the club they indicated they were in confidential discussions with several landowners in different locations (they would not say where due to commercial sensitivity) and therefore I am not convinced that an application will necessarily be forthcoming on this particular site."

This is further corroborated in a letter to a constituent from Cllr Michael Horwood, a senior member of Swanley Town Council and the councillor for Sevenoaks District Council whose ward runs up to the site boundary. He wrote: "We have always stated we want to see what exactly they (Wasps) are proposing for the town and local area in terms of infrastructure improvements, as well as many other demonstrable benefits before we make a decision whether we want to support it or not. To date, no information has been provided, and I personally do feel it is becoming a bit of a pipe dream ... in the absence of any information coming forward, I am not happy to support it through the Local Plan process, and my feeling is the Town Council would likely object on the basis that no information has been provided to show any benefits to the area, despite having well over a year to do so."

Founded in 1867 as Hampstead Football Club, Wasps have been variously based in Sudbury in Surrey, at Loftus Road in Shepherd's Bush, London and at Adams Park in Buckinghamshire. Their last home was the Ricoh Arena in Coventry. Wasps has never had any presence in south east London or Kent and so would have to build its fan base up from next to zero.

The average stadium capacity in the RFU championship is between 4-5,000. Worcester Warriors' biggest attendance this season has been 9,000 for the opening game.

The Rugby Football Union has stated that if WASPS rugby club does play again, it would have to start at the very bottom of the pyramid (level 10). Attendances at that level are counted in the tens; not the hundreds and never in the thousands.

As a comparison, the three closest Championship football clubs to Crockenhill (Millwall, Charlton and QPR) have all been established in their communities for more than a century. Each has a stadium with a capacity of 20,000 or less. Also in London, Brentford, who play at the top level of English football have a capacity of 17,000 for games featuring Liverpool, Arsenal and Manchester United.

On this basis, the provision of a 24-28,000 stadium, for a club that does not currently exist, is an utter fantasy.

It should also be noted, that WASPS built-up a £100 million debt on their last stadium project. That was when they were playing at the top level of English rugby.

All of the above places a major question mark over the viability of this project. No robust evidence has been provided that this stadium has a realistic prospect of ever being developed or that it could be viable. It thus fails the deliverability criteria set within the NPPF.

This situation also raises concerns about what happens if the Local Planning Authority does allocate this land for industrial use through the Local Plan, but the Wasps stadium is never built. Once the principal of development has been given, it will be difficult to resist an application for another employment use.

Crockenhill Parish Council is incredulous as to how the Local Planning Authority has allowed this nebulous proposal to reach this far in the Local Plan process.

The NPPF insists that all planning policies within a Local Plan have to be realistic. There is a significant risk that if this nonsense proposal remains in place, it will undermine the credibility of the Local Planning Authority, and then the viability of the Local Plan as a whole will be put into question.

2. Impact on the landscape

The proposed development would cause irreversible damage to our open countryside and the rural setting of Crockenhill.

All of the proposed site (SWAN17) lies within Green Belt, and a quarter of the site is within the National Landscape.

The NPPF (Dec 2024) remains clear that the government still attaches great importance to the Green Belt (para. 142) and that Green Belt boundaries should only be altered where *exceptional circumstances* are fully evidenced and justified (para. 145). The most recent amendments to the NPPF do not weaken the Green Belt protection afforded to Petham Court and continue to place great weight on the value of National Landscapes.

The NPPF re-emphasises that new development should be in locations that can be made sustainable and/or offer a genuine choice of transport modes which this site currently fails to deliver.

No evidence has been provided by the Local Planning Authority (LPA) that there is a need to explore Green Belt options to meet its industrial requirements. Indeed, in the current

Regulation 18 Consultation Local Plan it is proposing an overall allocation of industrial land that is three times greater than the identified need. Even without the Wasps site and the adjoining Pedham Place mixed-use development, the LPA will have more than sufficient industrial sites allocated.

However, should the LPA provide evidence of need for a green belt industrial allocation, the appropriateness (or otherwise) of potential Green Belt locations becomes a critical consideration.

NPPF para. 148 states: *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.”*

The proposed SWAN17 site at Petham Court currently consist of allotments and active agricultural land. It is not previously developed.

The site is separated from Swanley by the A20 and the M25 Junction 3 interchange. Swanley railway station is more than two miles from parts of this site. It is not in a location that could easily be made sustainable or offer a genuine choice of transport modes.

It should be noted that other sites in this location at Petham Court (HO/25/00067), Wested Farm (HO/2100060 and HO/21/00066) were assessed as Contrary to Strategy in the SHELAA_Appendix_F evidence Base.

3. NPPF Environmental Objective

The proposals do not protect and enhance the natural environment and meet the environmental objectives of the NPPF for the following reasons:

- The site is located within Green Belt and part of the site is within the Kent Downs National Landscape.
- Sustainable transport measures are not significant enough to deter car use to access events at the site, causing more congestion and pollution.
- Proximity to the M25 and M20 creates a barrier for sustainable transport journeys by foot, bike or public transport.
- It will cause significant traffic increases on several corridors including Junction 3 of M25 and this will have a negative impact on air quality.
- Impact on environmental designations and biodiversity is not assessed in detail.

4. No viable site Masterplan

The Regulation 18 Local Plan (November 2025) is quite vague about the inclusion of the Wasps Stadium and provides negligible details on the potential proposals apart from the site boundary. Just one paragraph (1.39) is given.

Immediately before the Local Plan was published for consultation, the site boundary was changed twice due to representations by Crockenhill Parish Council that the land included

within each site plan was not available (written evidence was provided by the parish council that the freeholders did not wish to sell).

The current (third) site plan shows a collection of land that makes no sense in terms of master-planning and connectivity.

A quarter of the site is within the National Landscape. In the Local Planning Authority's own words "this portion of the site would not be considered suitable for development". So 25% of the site is undevelopable.

The site plan (page 56) then shows a detached area of land that is currently high-yielding farmland (fruit in polytunnels). This piece of land is more than a mile from the top part of the site and separated by the National Landscape zone and a private farm. The only connection is a narrow country lane.

No details are given, but we presume that this part of the site would be for parking. The separation and lack of connectivity make this part of the proposal absurd.

The eastern part of the site immediately adjoins of a number of private houses. The impact on the people who live here will be considerable. There would need to be (as an absolute minimum) a considerable buffer of land between this residential area and the new stadium,

Finally, the north-eastern part of the site contains statutory allotments. Statutory allotment sites are protected under the Allotments Act 1925, requiring consent from the Secretary of State before disposal. Their loss can only happen if the land is proven surplus to need, and an alternative site is provided,

This site has been run by the Petham Court Allotment Association since the 1980s. They have a high occupancy rate and undertake a lot of work with disabled and at-risk groups in the local community. The other allotment site in the parish is owned by Crockenhill Parish Council at Harvestfield on the other side of the village. This currently has a waiting list. There is a clear need for allotments in this area. The stadium proposal makes no provision for new allotments elsewhere.

The Petham Court allotment site is currently subject to an application to be added to the register of Assets Of Community Value (decision by mid-January 2026). Funding has been identified for the community to buy the site if it was ever put up for sale. The availability of this part of the site is thus in doubt.

So overall:

A quarter of the site is National Landscape and can not be developed

A third of the site is a significant distance away with no connectivity.

Another part of the site is statutory allotments and could soon an Asset Of Community Value

Another part immediately adjoins private homes

There is not much of the site left to accommodate a 28,000 seater stadium, plus significant new access points, public transport facilities and coach and car parking for 28,000 people, plus landscaping, a hotel, a medical centre and training pitches.

No Masterplan has been produced to show how this can be done. We therefore conclude that that the proposed site boundary does not include enough viable land to accommodate this development.

5. No identified need for this industrial allocation

Sevenoaks District Council has identified a need of 40,400 sqm new employment floorspace in its Local Plan. This employment need is already covered by other sites that will provide in excess of 51,231 sqm new employment floorspace. This is without the employment provision at the proposed Pedham Place site next door which the Local Plan indicates could provide an additional 49,000 sqm of employment land.

The positive employment effect of the Lidl Supermarket at Broomhill has not been factored in.

Employment opportunities at the stadium complex are unlikely to give permanent jobs to local people, because for major events most of the administrative, catering and security staff would be brought in by outside contractors.

6. Lack of a Transport Impact Assessment

No comprehensive travel plan has been produced to show how up to 28,000 spectators plus staff and officials would be able to access this site in a sustainable manner.

Swanley Railway Station is singularly unsuitable for handling large crowds and would require very specific arrangements, requiring extra staff and operating restrictions that would impact other services. If travelling to/from Swanley Station, crowds would still have two kilometres to traverse and would be likely to disturb life for Swanley and Crockenhill residents.

The other option would be to lay on connecting bus services onto already congested roads. If Farningham Road and Eynsford stations were used, those bus services would need to use the A20 and M25 J3 with all the problems outlined below.

The location near J3 of the M25 is mentioned as a means of visitors accessing the site, however the proposals do not mention the extent of land required for parking,

The Local Plan Annex 1 (p.328) gives the Kent County Council criteria for the provision of car parking spaces for stadia as 1 space for 15 seats (i.e. car park capacity of 1600 for 24,000 seat stadium) and 1 coach space for 300 (i.e. capacity for 80 coaches).

We do not feel that full weight has been given to the impact of this development on the existing local transport infrastructure,

The Sevenoaks Local Plan, Initial Baseline Transport Assessment (August 2022) shows that the M25 J3, the B258 & B2173 High Street, the B2173 London Road, the A20 Main Road/A225 Dartford Road, and Gorse Hill Main Road/Donkey Lane are already at capacity.

The Sevenoaks Local Plan Forecast Baseline Report (October 2025) shows that additional junctions and roads will reach capacity by 2042.

No overarching impact assessment has been undertaken to evaluate the combined impact of extra traffic generated by other developments, such as the 2,360 additional homes proposed on other sites in Swanley, the 1006 additional homes in Hextable, the new Lidl supermarket at the Broomhill site, near junction 3 of the M25, the Millwall football complex and the London Golf Course leisure and wellbeing destination in West Kingsdown.

Extra traffic generated by a 28,000-seater stadium will have an adverse effect on both the national and local infrastructure in the immediate area surrounding the proposed site.

The M25 is regularly at a standstill at the Swanley Junction 3 and the issues that this junction experiences on a daily basis are well documented.

When there are accidents or other hold-ups anywhere south of the Dartford Crossing, or congestion at the Dartford Crossing, the Swanley intersection is grid-locked. Traffic then tries to find alternative routes through Swanley or local lanes to avoid the jams. This has an adverse knock-on effect on the local road network.

When there is an event at the international motorsports venue of Brands Hatch (about 4 miles to the east of the stadium site) all major and local roads are congested.

With car journeys generated by up to 28,000 visitors to the proposed stadium, traffic is likely to come to a standstill for everyone. Even with major highway alterations, traffic problems would not be solved, but merely displaced. In any case Highways England currently has no plans or funding to improve the road network at M25/M20 junction 3.

A significant number of visitors to the stadium will come from the west and the adjoining London Borough of Bromley. The most direct way to access the stadium from places such as Orpington and Bromley would be to drive through the country lanes that converge in the village of Crockenhill. With its narrow streets, parked cars and tightly packed homes and two churches, this is a recognised bottleneck. Any increase in traffic through the village will cause significant traffic safety concerns for residents and have a negative impact on villagers' quality of life.

At present, whenever there are traffic jams through Swanley and on the M25 there is a tendency to use the B258 and its feeder lanes (Crockenhill Lane, Wested Lane, Eynsford Road to the east) as rat-runs. If a 28,000 seater stadium is permitted on the edge of this small village, the situation will become untenable.

7. Contrary to Policy EMP2 (criteria a-h)

a) It would not meet employment need. Sevenoaks District Council has identified a need of 40,400 sqm new employment floorspace in its Local Plan. Employment need is already covered by other sites that will provide in excess of 51,231 sqm new employment floorspace. The positive employment effect of Lidl Supermarket at Broomhill has not been factored in. Employment opportunities at the stadium complex are unlikely to give permanent jobs to local people because for major events administrative and security staff would be brought in by outside contractors.

b) There would unacceptable loss of existing use -

- Productive farmland - Grade 2 and 3 – which is scarce in the Sevenoaks District.
- Viability of 2 farms would be affected - one producing milling wheat for bread (at Petham Court), and one producing top quality soft fruit (at Wested). 2 equestrian businesses would also be affected. The sites suggested would be incompatible with agricultural production.
- Open countryside with footpath network and bridleway access, which would be lost.
- Allotments at Petham Court would be lost
- There is a need to protect green and natural spaces for the wellbeing of adjoining neighbourhoods

c) It does not enable regeneration or most efficient use of land, because the land is very productive and efficiently managed as working landscape.

- d) It would more than significantly add to the need to travel in order to access and leave the venue.
- e) It would have an unacceptable impact on highways, the local roads are already at capacity.
- Sevenoaks Local Plan, Initial Baseline Transport Assessment (August 2022) shows that the M25 J3, the B258 & B2173 High Street, the B2173 London Road, the A20 Main Road/A225 Dartford Road, and Gorse Hill Main Road/Donkey Lane are already at capacity.
 - Sevenoaks Local Plan Forecast Baseline Report (October 2025) shows that additional junctions/roads will reach capacity by 2042, in addition to the above junctions.
 - Unreasonable to promote more road use when 2360 new homes are proposed for Swanley, 1006 for Hextable and a possible 2579 at Pedham Place. All will require access to the same transport routes.
 - In addition, the aggregate effect of more traffic to the permitted developments of Lidl near M25 J3, the Millwall training ground complex and the London Golf Course 'leisure and wellbeing destination' at West Kingsdown have not been felt yet.
 - Brands Hatch events currently have severe impact on M25 J3 and A20. Events at the other venues will make the situation worse for local road users.
- f) It does not generate activity appropriate to the area, which is rural countryside with farming, other rural businesses and access for the enjoyment of open spaces.
- g) It has an unacceptable impact on natural environment, by building over it.
- Pollution (noise, light, litter)
- h) It has unacceptable impact on landscape and visual amenity
- Land rising from Crockenhill forms a backdrop of countryside views
 - The site provides a green open outlook and lungs for the housing estates in south-east Swanley
 - Important for wellbeing
 - Stadium would conflict with the character and scale of the area
 - The railway, A20, M25 form strong and permanent boundaries to contain the urban area. To the south of Swanley the distinct character is of farmed, open countryside. This character is maintained southwards all the way to the A21 at Chelsfield.
 - Any built development south of the A20 and west of the M25 would create precedent and have no natural containment.

8. Contrary to Policy HW3 (criteria b-d)

- b) The stadium would not safeguard the quality of amenities of existing and future occupants of nearby properties by ensuring that development does not contribute to and avoids areas where occupiers of the development would be subject to excessive light pollution, noise, odour, vibration and/or other pollution
- c) The stadium would produce unacceptable levels of light and noise pollution
- d) A Noise Impact Assessment has not been carried out.