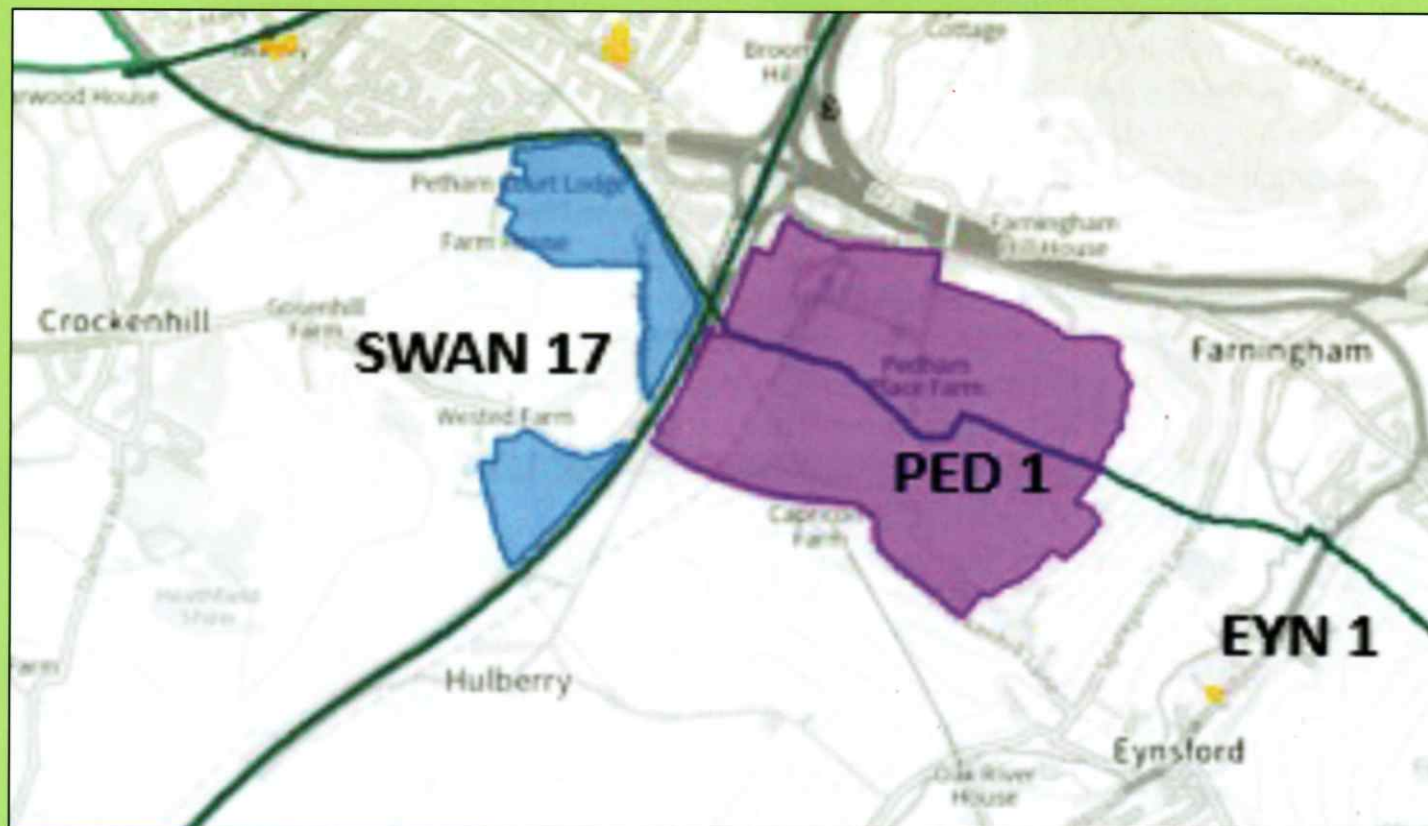


# Sevenoaks Local Plan



Farningham  
Parish Council



Sevenoaks District Council (SDC) is consulting on its new Local Plan 2027 - 2042, which will decide where **17,175 new homes**, jobs and infrastructure will go across the district.

## **Now is the time for residents to comment and help shape the future of our area.**

SDC is seeking your views on the plan. Two major sites are being considered which could have significant implications for our communities:

- **Pedham Place (ref. PED1)** – is proposed as a new standalone settlement to include 2,579 new homes, and 49,000 m2 of industry.
- **WASPS Stadium (ref. SWAN17)** – is proposed as a 28,000-seater sports arena, and associated training facilities.

**Farningham Parish Council (FPC)** is encouraging all residents to submit a response. The consultation includes 3 options for development. SWAN 17 is included in both options 1 and 2, whereas PED 1 is included in option 2 only. FPC is supporting a third option of **“None of the Above”** as we can't support the proposed stadium. We recommend commenting on individual sites and policies in the plan, please see overleaf for details.



# Farningham Parish Council recommends commenting on the following policies:

## Development Strategy (Policies ST1 & ST2 )

FPC supports the principles of Option 1, which takes a strategic and sequential approach to balancing the housing needs of Sevenoaks across the District.

- However, we can not support Option 1 whilst it includes Petham Farm (SWAN17) as a suitable site for a 28,000 stadium and associated facilities adjacent to Swanley Interchange.
- No option is provided to support Option 1 excluding SWAN 17

FPC **fundamentally objects to Option 2** which includes Pedham Place (PED1) as a mixed-use, new settlement delivering 2,579 homes within the protected Kent Downs National Landscape

- We believe the modest shortfall of 854 homes from Option 1 can be met by increasing densities of existing allocations, or through a Duty to Co-operate with Dartford Borough Council.
- We also believe that SDC has not provided evidence of 'Exceptional circumstances' required to justify releasing land within the National Landscape as required through Option 2..

## Housing and Density (Policies H1, H2, H3, SP3)

FPC support the principles of 'Housing Choice for All' to include a greater concentration of 1- and 2- bedroom homes, affordable homes, and homes for older residents across the district, however;

- The plan does not make it clear what densities will be achieved on each site.
- It is unclear why **modestly increasing densities by around 5%**, to help meet the district's housing requirement, has not been prioritised.
- In Option 2, it is **unjustified** to concentrate **35% of the required 17,175 homes**, plus a **28,000-seat stadium**, at the already congested **Junction 3 of the M25**.

## Employment (Policies EMP1, EMP 2 and TLC1)

FPC supports the ambition for a vibrant local economy focused on sustainable town centres, and up to 40,000 m2 of additional floorspace, with 27,000 m2 being Class E Office Use, however:

- The need for up to 49,000 m2 of B2 (Industrial) and B8 (Storage) floorspace has not been demonstrated. It is unclear why such uses are deemed appropriate at **Pedham Place**, within the National Landscape. Exceptional circumstances cannot be justified.
- FPC is concerned that commercial development at Pedham Place would undermine the regeneration of Swanley Town Centre (SWN1) and negatively impact Eynsford Historic Town.

## Natural Environment (Policy NE1 and BW1)

**FPC support** the commitment to maintaining, enhancing and protecting the National Landscape areas. We, therefore:

- Challenge the need to release Pedham Place to meet a modest housing gap of 854 homes.
- Reject any suggestion that there is a **public benefit** or **exceptional circumstance** sufficient to justify development within this important highpoint within the Kent Downs National Landscape.

## Transport (Policies T1, T2, T4)

FPC supports SDC's Local Plan principle of creating sustainable, well-designed places where residents can live, work and thrive without relying on their cars. However, we are concerned that proposals contradict this ambition, specifically:

- Both proposals at Ped1 and ~~SWAN17~~ are located at Junction 3 of the M25, already identified as the most congested location in the district.
- Traffic impact Assessments will only be completed after sites are included (Policy T1), and suggestions that a develop will pay for the required upgrades are unrealistic. Therefore, proposals here will worsen congestion on local roads, contrary to (Policy T2).



Farningham Parish Council recommends commenting on the following site allocations;  
Pedham Place PED1 and the Wasps Stadium SWAN17

Farningham, Crockenhill and Eynsford Parish Councils have commissioned advice from Tibbalds Planning and Urban Design, to inform our response. Based on their detailed findings and evidence base, FPC fundamentally oppose these sites within the Local Plan for the following reasons:

**1. PED1 is not a viable or appropriate new settlement**

- A development of **2,579 homes** would not function as a standalone settlement, nor could it viably provide the range of facilities required by **7,000 residents**.
- Government guidance indicates new towns must generally provide **10,000+ homes** and **should not be used to meet local authority housing targets**. Therefore, Pedham Place is **neither appropriate nor helpful** in meeting the district's needs.

**2. Exceptional Circumstances and public benefit have not been demonstrated at PED 1 and SWAN17**

- SDC has not provided evidence of the **'exceptional circumstances'** required to justify releasing a strategic site within the **Kent Downs National Landscape**.
- The housing gap of 854 homes is modest and could be addressed through **increasing densities on existing allocations** or via **negotiation with neighbouring authorities**, rather than releasing PED1.
- Releasing Green Belt and National Landscape here, fails to meet the **Environmental Objective** of the **National Planning Policy Framework (NPPF)** and contradicts **Policies EN1, EN2 and EN3**.

**3. PED 1 and SWAN17 conflict with economic ambitions of the Local Plan needs and policies**

- Pedham Place and Petham Farm propose **the wrong type of development in the wrong location** to meet the district's need for **office focused employment** in sustainable, accessible places.
- These proposals would **deduct from**, rather than support, existing town centres such as Swanley Town Centre, contrary to the **Economic Objective** of the NPPF.
- Jobs created by a 28,000-seat stadium would be **transient and seasonal**, not sustainable, nor reflective of the needs assessment of the Local Plan, and therefore conflict with **Policy ED1**.

**4. PED1 and SWAN17 harm social objectives and community needs of the Local Plan policies**

- The scale and nature of development at Pedham Place and Petham Farm do **not contribute to a vibrant, sustainable community**, as required by the **Social Objective** of the NPPF.
- Pedham Place currently provides **affordable, accessible sports facilities**. Its loss contradicts **Policy SL1**, to retain and support existing sports and leisure provision unless it is proven unviable.
- The proposal for a cluster of "world-class sporting facilities", including a **28,000-seat stadium** at Petham Farm, is **not based on local need** and would instead cause harm through increased traffic congestion (Policy T1), worsened air quality (Policy AQ1), and reduced biodiversity (Policy BW1).

**5. PED1 and SWAN17 are unsustainable locations in terms of public transport and access**

- Both sites are in **unsustainable locations**, where travel would be dominated by car use.
- Access to the nearest train stations and movement by walking and cycling is restricted by **physical barriers**, including London Road and Swanley Interchange, making sustainable travel unlikely.

**6. Harm to the National Landscape and historic environment**

- Pedham Place lies within the **Kent Downs National Landscape** adjacent to the historic setting of **Eynsford**, which SDC has defined as a historic town (Policies EN3, EN6).
- The scale of development would have a **major visual impact**, harming the historic landscape.
- Relying on a **visual assessment alone** to justify releasing a National Landscape site is **unsound** and risks the soundness of the entire Local Plan.



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Sevenoaks District Council (SDC) is consulting on its new Local Plan 2027 - 2042, which will decide where 17,175 new homes, jobs and infrastructure will go across the district. This Plan will significantly change Sevenoaks District, and this is your opportunity to have you say.

**Now is the time for you to comment  
and help shape the future of your area.**

## How to Respond:

**Policies** - Comment on any **Policies you have views** on (see inside for details).

**Sites** - Comment on any **Sites you have views** on, including PED1 and SWAN17 (see inside for details).

**You can find out more and submit your comments on SDCs website. You must select different links to comment on sites or policies:**



<https://engagement.sevenoaks.gov.uk/strategic-planning/emerginglocalplan>



SDC has provided flow charts to help guide responses.

These are available on FPCs news page, and via QR code:

[https://www.farninghamparishcouncil.org/news-latest\\_news.html](https://www.farninghamparishcouncil.org/news-latest_news.html)

## Remember:

- The deadline for comments is 11:59pm on 11<sup>th</sup> December 2025
- FPC is supporting **“None of the Above”** and suggests commenting on individual sites and policies in the plan.

Please use the information in this leaflet to help inform your response. You do not need to follow this guidance directly, however use it to inform your own opinion and response.

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