Farningham Parish Council combined response to sites and policies for Sevenoaks District Council emerging Local Plan, Autumn 2025.

Comments on Policy ST1

Farningham Parish Council (FPC) wish to commend Sevenoaks District Council (SDC) for taking a strategic and sequential assessment of sites across the Sevenoaks District in developing an ambition for a more 'balanced strategy for growth' as proposed within this draft Local Plan. Whilst FPC appreciates this process was required to meet the challenging new housing targets for the district, and changes to the National Planning Policy Framework (NPPF) we do hope that FPC's recommendation to you from the last Regulation 18 consultation to take a more strategic and sequential approach to identifying sites was helpful in suggesting this approach.

Whilst FPC support the strategic and sequential approach that SDC have taken in principle, we remain very concerned with the number and scale of Green Belt sites which SDC have classified as grey belt and therefore suitable for development. We believe that SDC's liberal interpretation of grey belt based on nowhere in the borough being defined as a 'built-up area,' is a high risk and untested strategy, which could lead to many challenges and potential delays to the Local Plan implementation.

FPC would encourage SDC to take a further look at potential brownfield sites across the district, and to consider opportunities to increase densities in identified sites in order to reduce the number of Green Belt sites that need to be released. The housing needs identified in your draft Local Plan suggest the greatest demand in the district is for 1- and 2-bedroom homes, affordable homes, and housing for older residents to 'right-size', this would suggest higher density development in sustainable locations. There is insufficient information related to each proposed site allocation to understand the densities assumed on each site.

FPC could consider Option 1 a viable proposal subject to a more rigorous sequential test, and with less emphasis on Green Belt/grey belt sites if it had not included site SWAN17 to accommodate the proposed WASPs rugby stadium and associated facilities as an integral part of both Option 1 and Option 2. FPC believes that by including this site, for this purpose and in both options, residents are effectively forced to either endorse the proposal by choosing one of the options or selecting 'none of the above'.

As Policy ST1 outlines a strategic approach to the future of Sevenoaks District, it seems reckless for SDC to include the WASPs proposal minimal information is available upon which to judge the proposals of their impact.

FPC fundamentally oppose proposed Option 2, which includes site PED 1 as a standalone settlement. FPC together with Eynsford Parish Council and Crockenhill Parish Council have

commissioned Tibbalds, Planning and Urban Design to scrutinise the proposals for this site in relation to its appropriateness within the definition of the current National Planning Policy Framework. Evidence suggests that the proposals for Pedham Place are no longer viable or appropriate and should not be included in Regulation 19 process.

SDC have themselves stated on their published response to questions at the Eynsford Local Plan pop-up '*Pedham Place, which is both in the Green Belt and National Landscape (AONB), we have been very clear that this site is outside our development strategy, which seeks to avoid strategic scale growth in this designated landscape area. However, we want to test an option which meets full need (17,175) and option 2 meets this need*'

It is therefore a very high-risk strategy for SDC to take forward proposals to include PED1 in the knowledge that it does not comply with NPPF policy or your own Local Plan emerging policies. Such a reckless approach is likely to be found unjustified and unsound, with insufficient evidence to demonstrate the release of an important and strategic 140-hectare site within the Kent Downs National Landscape.

Whilst SDC do not support the release of any National Landscape sites, we would challenge the assumptions made by SDC and their consultants that PED1 is the most appropriate National Landscape site in the district to be released. SDC's recommendation to release PED1 rather than sites in Westerham is based on a visual assessment in 2024 that contradict previous assessments conducted by the same consultant on the same site only 5 years previous.

FPC would also like to question why Westerham as one of only four towns in the district hierarchy is only accommodating 93 homes over the plan period. Surely the strategic need for affordable homes in Westerham should be a major consideration in balancing the release of any Green Belt or National Landscape sites. Whilst SDC appear to have taken a reasonable approach to balancing growth across the district in general, the lack of homes in Westerham stands out as a notable exception. In contrast there appears to be an over-concentration of homes dependent on junction 3 of the M25, including Swanley, and Hextable. If PED1 were to come forward this would equate to one third of all homes across the district being focused in this one location, which is already identified as the most congested.

FPC supports the principles of Option 1, which takes a strategic and sequential approach to balancing the housing needs of Sevenoaks across the District. FPC feel further work could be done to reduce the number of Green Belt sites to be released.

- However, FPC cannot 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 SWAN17.

Comments on Site PED1

Farningham, Parish Council (FPC) strongly oppose the inclusion on Site PED 1 (Pedham Place) to be considered as part of the Sevenoaks Local Plan process. This site is not compliant with either the principles of the National Planning Policy Framework (NPPF) or the proposed strategies contained within the Regulation 18 Consultation Document produced by Sevenoaks District Council (SDC) for this consultation process.

FPC fully support SDC in their ambition to develop a compliant Local Plan as quickly as possible, and we therefore encourage the council to develop an approach in the next phase of Local Plan development that is compliant national policy and the District's defined ambition for sustainable growth based on existing settlements with easy access to sustainable transport options.

FPC believe that if SDC pursue the folly of including Pedham Place, the Plan is much more likely to be found unsound, where **justification for exceptional circumstances is unlikely to be proven**. The current shortfall of 854 home does not justify the release of 141 hectares of the Kent Downs National Landscape, at a strategic high point of the Darent Valley Character Area, and within the proposed UNESCO Geopark.

Evidence in support of removing PED 1 from the proposed local Plan.

FPC, together with Eynsford Parish Council and Crockenhill Parish Council have commissioned advice from Tibbalds Planning and Urban Design, to scrutinise proposals for Pedham Place based on their expert knowledge of new settlements and New Town and on statutory planning policies including the National Planning Policy Framework. FPC can share the detailed findings from Tibbald's if helpful, however we summarise them here, and ask that they be fully considered before further consideration of Pedham Place to be included in the Local Plan Regulation 19 stage.

1. The Government have clearly set out their principles for New Town scale development in their publication Building New Towns for the Future published in February 2025, which indicates new towns must generally provide in excess of 10,000 homes to have any chance of being viable, sustainable and self-sufficient. Subsequently the New Town Taskforce Report to Government have made clear recommendations around placemaking principles, scale and location of New Towns, which include both standalone New Towns and sustainable extensions to existing places. **Pedham Place is clearly neither large enough to be a New Town or Standalone Settlement, nor in the right location to be a sustainable extension to Swanley** due to its location physically disconnected from Swanley. Furthermore, we understand that proposals which emerge from the New Towns process cannot **be used to meet local authority housing targets**. Therefore, Pedham Place is **neither appropriate nor helpful** in meeting the district's needs.

2. Proposals for Pedham do **not meet the criteria for Sustainable Development as set out in NPPF**. Tibbalds have reviewed the proposals against the environmental, economic, and social objectives outlined in the NPPF's description of sustainable development and has found the proposals to be unsound against all three criteria,

   Releasing Green Belt and National Landscape here, fails to meet the **Environmental Objective** of the NPPF and contradicts Policies EN1, EN2 and EN3 set out in SDC's proposed Local Plan.

   Pedham Place propose the wrong type of development in the wrong location to meet the district's need for office focused employment in sustainable, accessible places. Employment and commercial proposals at Pedham Place would detract from, rather than support, existing town centres such as Swanley Town Centre, contrary to the **Economic Objective** of the NPPF. Proposals at Pedham Place encourages employment uses that are not needed and unlikely to be taken up by the local residents, resulting in both in and out migration for work, further contributing to traffic congestion and hindering sustainable growth.

   Proposals at Pedham Place do not reflect or support the social objectives of the Farningham community. The scale and nature of development at Pedham Place is unlikely to support a vibrant, sustainable community, as required by the **Social Objective of the NPPF**. In contrast, 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.

3. **Sustainable Transport options at Pedham Place are unviable.**

   Pedham Place is in a fundamentally **unsustainable location**, 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.

   The Local Plan support documentation highlights that both the Swanley Interchange and the London Road between the Swanley Interchange and Swanley Town Centre are two of the four most congested locations in the Sevenoaks District. However, should Pedham Place be included in the Local Plan.

   Why are SDC proposing such a concentration of development focused on Junction 3 of M25, which has already identified as one of the 4 locations suffering from the greatest concentration of traffic congestion.

Including proposals for Pedham Place in the Local Plan is reinforcing the challenges of traffic congestion, air pollution, and further reliance on cars as the primary mode of transport. Furthermore, concentrating so much of the proposed new development suggested in Option 2 of the Local Plan Development Strategy on the location which has the greatest existing congestion is unlikely to be supported by Highways England or Kent County Council. Suggestions of a developer funding major highway improvements in unfunded and options to connect Pedham Place in a sustainable way to Swanley Station is unproven. Highways England have no plans to upgrade Swanley Interchange, yet Options 2 proposed 35% of all new housing in the district (Swanley 14% + Hextable 6% + Pedham 15%) + Wasps (28,000 stadium+) in one location, which already suffers from the greatest concentration of traffic congestion and air quality pollution in one location.

4. **Impact to Air Quality and health of residents**

   In addition to the increased congestion and vehicular trips expected from proposals at Pedham Place, proposals will also have a negative impact on air quality. The Regulation 18 Local Plan (November 2025) states that vehicle emissions are the main contributor to poor air quality in the district and there is a high dependency on private vehicles to make journeys to key locations within, and outside of, the district. Policy AQ1 of the emerging Local Plan states that new development should result in a positive or neutral impact on air quality for new residents, the existing surrounding area and other areas connected to the development. Whilst air quality assessments are normally undertaken at the planning application stage, this should be provided now to inform the Local Plan site allocation process due to the site's location adjacent to two motorways, and in a location already identified as having the greatest concentration of traffic congestion in the District. When combined with proposals at Petham Court Farm to include a 28,000 stadium it is essential that the considerations of health and air quality are considered before any sites are allocated within the Local Plan. An air quality assessment that compares the existing baseline data with the forecasted data for Pedham Place proposals needs to be completed to understand the severity of this issue and if it is possible to be air quality neutral or positive with mitigation measures, given the Site's location.

5. **Irrevocable Harm to the National Landscape and historic environment**

   Pedham Place lies fully 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 revised NPPF (Dec 2024) reinforces the protection of the National Landscape and attaches significant importance to the Green Belt (para. 142) stating that Green Belt boundaries should only be altered where exceptional circumstances are fully

evidenced. Whilst amendments to the NPPF, seek to facilitate housing delivery they do not weaken the National Landscape and Green Belt protection afforded to Pedham Place. The NPPF re-emphasises that new housing development should be in locations that can be made sustainable and/or offer a genuine choice of transport modes which Pedham Place cannot.

The NPPF provides significant protection to National Landscapes stating that great weight should be given to conserving and enhancing landscape and scenic beauty within them (para. 189) and, when considering applications for development, these should be refused for major development unless exceptional circumstances exist and development is in the public interest (para. 190). Collectively, these provide a 'high bar' for any such development proposal.

SDC have not set out the evidence to prove 'exceptional circumstances; required to release a strategic site at Pedham Place from both the Green Belt and the National Landscape. SDC have not clearly demonstrated the benefits that would be for the public interest at Pedham Place, which cannot be delivered in more sustainable locations, outside of the National Landscape, such as Swanley, Sevenoaks, or Edenbridge.

FPC do not believe that SDC have provided evidence to prove that their modest housing gap of 854 homes cannot be met from other means. FPC encourage SDC to exhaust all other options to avoid the need to release National Landscape sites in the district.

FPC believe there is further potential to

- increase densities of existing allocations by a modest 5% reflecting the districts need for 1- and 2-bedroom homes which are often 60 to 100 dwellings / hectare,
- identify homes in neighbouring authorities including Dartford through a Duty to Co-operate to reduce the targets number of homes required. The Swanley - Farningham – Eynsford area function as part of a wider Dartford Housing Market area.
- optimising masterplans of existing sites to be more efficient to achieve required targets within identified sites.

Whilst FPC do not believe there is any need to release National Landscape sites in the district, we fundamentally challenge SDC and their consultants recommendation that Pedham Place should be released in preference to other sites in West Kingsdown and Westerham based on their visual impact assessment alone. Clearly the need for housing in Westerham is much greater than at Farningham, or Eynsford. Swanley is

already proposed to accommodate its fair share of district need, and yet Westerham as the fourth largest town in the district is accommodating 37 homes only. Surely need should be a major consideration as well as visual impact.

The scale of development proposed at Pedham Place releases 10% more housing than needed, which will result in many more sustainable and challenging sites remaining undeveloped where housebuilders will prefer a Green Belt site in the national landscape.

The scale of Pedham Place will have a major visual impact, harm the historic and natural landscape, and impinge on the Historic Town status of Eynsford. Relying on a visual assessment alone to justify releasing of a National Landscape site is unsound and risks the soundness of the entire Local Plan. The Landscape Assessment (Landscape and visual evidence for SDC Local Plan 2040- November 2024) states that development at Pedham Place would see larger scale effects contained within one specific area and may have several effects on landscape and views including; Changes to the rural characteristics of the site and the wider landscape; Loss of recreational value of the golf course; Changes to long views across the Darent Valley; Impact on the setting and sense of separation between Swanley and Farningham. It therefore feels inconceivable to FPC how SDC and their consultants can conclude that the Pedham Place proposals would be likely to cause the least harm to the Kent Downs National Landscape compared to the other options. We do not believe that this recommendation is robust and would stand up to formal scrutiny. This reinforces why including PED 1 in the Local Plan, has the greatest risk to SDC of having their Local Plan found to be unsound and unjustified.

Comments on site SWAN17

Farningham Parish Council (FPC) strongly oppose the inclusion of Site SWAN 17 (Petham Court Farm) to be considered as part of the Sevenoaks Local Plan process, as a proposed site for a 28,000-seat stadium, and associated sports and recreation facilities). This site is in the Green Belt and is not compliant with either the principles of the National Planning Policy Framework (NPPF) or the proposed strategies contained within the Regulation 18 Consultation Document produced by Sevenoaks District Council (SDC), specifically policies ST1 and NE1 which promote sustainable development and protection of the natural environment. The proposed uses at Petham Court Farm do not meet the criteria for 'exceptional circumstances' to justify release of well-functioning Green Belt or National Landscape sites. The proposed facilities at Petham Court Farm are not meeting a defined local need, and in contrast are likely to cause significant detriment to local residents through increased traffic congestion and worsened air quality.

Whilst FPC fully support SDC in their ambition to develop a compliant Local Plan as quickly as possible, and we therefore encourage the council to develop an approach in the next phase of Local Plan development that is compliant with national policy and the District's defined ambition for sustainable growth based on existing settlements with easy access to sustainable transport options. The inclusion of Petham Court Farm in both Option 1 and Option 2 of the Local Plan Strategy means that FPC cannot support either option. FPC appreciate the challenge that SDC have in meeting their housing targets within the physical and environmental designation restrictions within the district, and so we cannot understand or support the rationale for SDC to extend this challenge to include a proposed rugby stadium and associated facilities in this location which does not meet any defined local need. FPC believe that the inclusion of SWAN 17 in both development options of this Regulation 18 consultation has been a poorly calculated move by SDC that further confuses local residents in making a decision and making genuine comments on the real challenge for the district in determining the most appropriate location for sustainable housing and mixed-use developments.

FPC believe that if SDC continue to include the proposed stadium and associated facilities in the formal Local Plan process, when so little information is available on its impact on existing traffic congestion the Local Plan is much more likely to be found unsound, where justification for exceptional circumstances to release this Green Belt site is unlikely to be proven.

Evidence in support of removing SWAN 17 from the proposed local Plan.

FPC, together with Eynsford Parish Council and Crockenhill Parish Council have commissioned advice from Tibbalds Planning and Urban Design, to scrutinise proposals for Petham Court Farm based on their expert knowledge of the National Planning Policy Framework. Tibbald's have concluded that the proposals for the 28,000-seat stadium and associated facilities cannot be justified, and due to the limited information upon which to judge proposals, they should not be taken forward in this Local Plan process toward the Local Plan Regulation 19 stage, for the following reasons:

FPC fundamentally **challenge SDC's proposed policy SL1**, to include a cluster of "world-class sporting facilities" in the north of the district. There **is no clear rationale or justification for this proposal**. It is unclear why this policy has become a priority for the Local Plan when it does not contribute to the defined social or employment needs of the district, and may use important land which could otherwise be used to meet the challenging housing targets. Notwithstanding the rationale of the policy itself it is reckless for SDC to focus these proposals along the A20 corridor, where sustainable transport options are a challenge. SDC's emerging policy proposes that facilities will only be supported where there is: identified need; sustainable transport links; and a valuable contribution to the health of the local community. The proposed 28,000-seat stadium at Petham Court 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). **Sustainable transport is not an option** as the site is disconnected from Swanley, and proposed facilities are private and commercial and beyond the reach of most of the local residents.

The Petham Court Farm site is in Crockenhill Parish, separated by the M25 and located southeast of Swanley town on the opposite side of the M20/A20. This site comprises agricultural land and is located within the Green Belt and is partly within the Kent Downs National Landscape. The Regulation 18 Local Plan (November 2025) **is vague** about the inclusion of the Wasps Stadium and does not provide many details on the potential proposals apart from the site allocation details.

FPC do not believe that proposals for Petham Court Farm can meet the criteria for Sustainable Development as set out in NPPF. Tibbalds have reviewed the proposals against the environmental, economic, and social objectives outlined in the NPPF's description of sustainable development and has found the proposals to be unsound against all three criteria.

The NPPF (Dec 2024) remains clear that the government still attaches significant importance to the Green Belt (para. 142) and that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced. Whilst recent amendments to the NPPF, may seek to facilitate housing delivery they do not weaken the Green Belt protection afforded to Petham Court Farm. 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 reference to paragraphs 110 and 115 of the NPPF. Releasing Petham Court Farm and potentially the adjacent National Landscape site will fail to meet the **Environmental Objective of the NPPF** and contradicts SDC Local Plan Policies EN1, EN2 and EN3 set out in SDC's proposed Local Plan. Petham Court Farm is prime agricultural land and performs a significant role in relation to the function of the Green Belt as defined in NPPF.

The emerging SDC Local Plan (Policy ST1) further states that sustainable patterns of development will be promoted by amending Green Belt boundaries only in 'exceptional circumstances', where sites have good access to services and facilities and their release has limited impact on the purposes of the Green Belt. Petham Court Farm is disconnected from Swanley, and the site clearly meets the purposes of the Green Belt, and it has not been evidenced by SDC what the exceptional circumstances are that would warrant the release of this site from Green Belt restrictions.

Petham Court Farm proposes the wrong type of employment in the wrong location to meet the district's need for office focused employment in sustainable, accessible places. Employment opportunities generated by the proposed stadium and associated facilities are likely to generate primarily seasonal and temporary jobs. Increased traffic generated by proposals will reinforce existing congestion issues at Swanley Interchange and the route to Swanley Town Centre, detracting from the opportunity to regenerate and sustain Swanley Town Centre which is central to proposed Local Plan policy SWAN1. Proposals do not therefore support the **economic objective of the NPPF**.

Proposed facilities at Petham Court Farm do not reflect or support the social objectives of the local communities. The proposals are for commercial and private sector sports facilities which are unlikely to be accessible or affordable to local residents. Furthermore, the facilities may compete with the recently completed White Oak Centre in Swanley, reducing the viability of that facility. Proposals for this site do not meet any defined local need, and therefore do not support a vibrant, sustainable community, as required by the **Social Objective of the NPPF**.

The NPPF (Paragraph 110) states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. Policy T1 of the emerging SDC Local Plan states that new development should be located near to existing facilities, services, and public transport infrastructure to enhance sustainable places. Petham Court Farm is not

located within close walking or cycling distance from Swanley train station and the scale of the development is not large enough to warrant a new train station and rail infrastructure closer to the site. This will inevitably mean that despite efforts to improve bus services and cycle routes, future users of the site will depend on cars. FPC note that there has been no transport or highways assessment associated with the proposed stadium proposals submitted as part of the Regulation 18 Local Plan consultation. This **raises significant highways concerns** and there are no details, or a logistics and travel plan of how the site would be accessed on match or event days.

The Local Plan supporting documentation highlights that both the Swanley Interchange and the London Road between the Swanley Interchange and Swanley Town Centre are two of the four **most congested locations in the Sevenoaks District.** However, should Petham Court Farm proposals be included in the Local Plan it is likely to further increase congestion in what is already the most congested location in the Sevenoaks District.

Including proposals for Petham Court Farm in the Local Plan is **reinforcing the challenges of traffic congestion, air pollution, and further reliance on cars** as the primary mode of transport. Furthermore, concentrating so much of the proposed new development suggested in Option 2 of the Local Plan Development Strategy on the location which has the greatest existing congestion is unlikely to be supported by Highways England or Kent County Council.

In addition to the increased congestion and vehicular trips expected with the proposals, this has a **negative impact on air quality.** The Regulation 18 Local Plan (November 2025) states that vehicle emissions are the main contributor to poor air quality in the district. Policy AQ1 of the emerging SDC Local Plan states that new development should result in a positive or neutral impact on air quality for the existing surrounding area and other areas connected to the development. Whilst air quality assessments are normally undertaken at the planning application stage, this should be provided now to inform the Local Plan site allocation process due to the site's location adjacent to two motorways. An air quality assessment that compares the existing baseline data with the forecasted data for Pedham Place proposals needs to be completed to understand the severity of this issue and if it is possible to be air quality neutral or positive with mitigation measures, given the Site's location and proposed use.

SDC have not set out the evidence to prove 'exceptional circumstances' required to release a strategic Green Belt site at Petham Court Farm from the Green Belt. SDC have not clearly demonstrated the positive social, economic, or environmental benefits that would be for the public interest at Petham Court Farm.

Comments on Policy ST2

FPC do not feel that it is credible or necessary to include Ped1 within the Local Plan. The gap of 854 homes outlined in the draft Local Plan is modest and could realistically be achieved through optimising densities in other sites, identifying further brownfield opportunities and through discussion with neighbouring authorities through the Duty to co-operate process. PFC not believe that SDC have adequately met their Duty to Cooperate, specifically in relation to securing the surplus homes identified in the approved Dartford Borough Council (DBC)Local Plan 2024-37. The evidence included for Duty to co-operate within the support documentation relies on an outdated response from DBC before they had undertaken their Local Plan process. DBC have now pole-vaulted over the timeframe taken by SDC to complete this process and have identified surplus homes that could meet 75% of the gap in SDC's housing targets.

Evidence from Tibbald's (the national experts in standalone settlements) suggests that the proposals for Pedham Place are not credible or viable as a standalone settlement, nor do they meet the government's definition for New Towns.

SDC have themselves stated on their published response to questions at the Eynsford Local Plan pop-up '*Pedham Place, which is both in the Green Belt and National Landscape (AONB), we have been very clear that this site is outside our development strategy, which seeks to avoid strategic scale growth in this designated landscape area. However, we want to evaluate an option which meets full need (17,175) and option 2 meets this need'.*

of or appropriate and should not be included in Regulation 19 process.

FPC **fundamentally objects to the inclusion of PED1 in ST2, 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.

Comments on Policy SL1

FPC fundamentally **challenge SDC's proposed policy SL1**, to include a cluster of "world-class sporting facilities" in the north of the district. There **is no clear rationale or justification for this proposal**. It is unclear why this policy has become a priority for the Local Plan when it does not contribute to the defined social or employment needs of the district and may use important land which could otherwise be used to meet the challenging housing targets. Notwithstanding the rationale of the policy itself it is reckless for SDC to focus these proposals along the A20 corridor, where sustainable transport options are a challenge.

Whilst the criteria for supporting proposals that respond to the proposed policy SL1 seem logical i.e. that facilities will only be supported where there is: identified need; sustainable transport links; and a valuable contribution to the health of the local community, the reality is that the policies' inclusion in the Local Plan will open the door for unsustainable and inappropriate development.

Proposals for SWAN17 highlight the risk of including policy SL1 in the Local Plan, where a proposed 28,000-seat stadium at Petham Farm is proposed which contradicts the SL1 policy, 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). SWAN17 is not in a sustainable location and highlights the folly in locating 'world class sporting facilities along the already congested and dangerous A20 corridor where sustainable transport is not an option.

Comments on Policy H7

Farningham Parish Council (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, as outlined in the draft Local Plan however, FPC believe that further work could be done to optimise densities in sustainable brownfield location across the district. The draft Loal 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.

FPC also considers it unjustified, under Option 2 of the Development Strategy, to concentrate 35% of the required 17,175 homes, along with a 28,000-seat stadium, at the already congested Junction 3 of the M25.

Comments on Policy T1

Farningham Parish Council (FPC) supports the principle of sustainable movement across the district, aiming to create well-designed places where residents can live, work, and thrive without relying on cars. However, FPC has significant concerns regarding the inclusion of sites PED1 and SWN17:

1. Location and congestion issues

- Both PED1 and SWN17 are located at Junction 3 of the M25, already identified as the most congested location in the district.
- Traffic Impact Assessments highlight that this area already experiences severe congestion. Additional development is likely to exacerbate traffic delays and reduce road safety.

2. Unsustainable travel and modal shift challenges

- Solutions for sustainable travel from these sites are currently untested, unproven, and unfunded.
- Proposals for upgrades to Swanley Interchange are not within Highways England priorities and therefore may not be deliverable.
- Reliance on private vehicles will remain high, contrary to the aims of Policy T1.

3. Need for infrastructure and modal shift support

- FPC recommends that any inclusion of these sites should be conditional on:
    - Delivery of public transport infrastructure improvements (bus, rail, taxis).
    - Enhanced cycling and walking routes connecting the sites to sustainable transport nodes.
    - Traffic management measures to mitigate congestion impacts.

4. Other considerations

- Development at PED1 and SWN17 may compromise the ability to meet the “golden rules” required for greenbelt release under sustainable transport criteria.
- Without substantial intervention, these sites are unlikely to support sustainable movement objectives outlined in T1.

Comments on Policy T2

FPC is concerned that current wording under T2 is too flexible and may not ensure developers deliver meaningful improvements. Specific issues include:

1. Clarification of "major developments"

- T2 does not clearly define what constitutes a major development.
- FPC recommends adding a precise definition to prevent ambiguity.

2. Obligations for developers

- Phrases such as "where possible," "should seek to," and "is encouraged" weaken accountability.
- FPC recommends replacing these with mandatory requirements to secure tangible improvements to transport and sustainable movement infrastructure.

3. Accessibility and inclusivity

- Designs must ensure adequate access and stopping places for disabled drivers, carers, and delivery vehicles.
- Consideration of shared transport facilities should be included, especially in locations poorly served by public transport.

4. Coordination with local plans

- Developers should be required to consult with Parish and Town Council Highway Improvement Plans and relevant Neighbourhood Development Plans.
- This ensures alignment with hyper-local infrastructure priorities and provides practical, evidence-based solutions.

5. Site-specific concerns for PED1 and SWN17

- Without stronger obligations, development at these sites may worsen congestion, reduce sustainable transport uptake, and increase reliance on private vehicles.
- FPC recommends these sites either be excluded or made conditional on demonstrable and funded sustainable transport solutions.

Comments on Policy GT2

FPC requests that SDC take full account of, and include, The Planning Policy Statement (PPS) on traveller sites that development should be proportionate and appropriately related to the scale and characteristics of the local area, set out in paragraph 10(d).

Comments on Policy EMP2

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, as outlined in the draft Local Plan.

However, FPC do not support proposals for PED1 to include up to 49,000 m2 of B2 (Industrial) and B8 (Storage) floorspace. The need for this type of employment floorspace is not in accordance with the principles of the strategic objectives and identified need within the draft 'Employment and Economy' policy. The need or justification for releasing site PED1 or SWAN 17 to support the local economy is not in-keeping with this policy.

It is unclear why such uses not identified in the 'employment and economy' priorities are deemed appropriate at **PED 1 and SWAN17**, within the Green Belt and National Landscape. Exceptional circumstances cannot be justified.

Furthermore, FPC are concerned that proposed commercial development at PED1 would undermine the regeneration of Swanley Town Centre (SWAN1) and negatively impact Eynsford Historic Town.

Comments on Policy DE1

Farningham Parish Council (FPC) requests to be consulted at the earliest possible stage of the design process, whilst designs are being developed and not after, and that a Parish Council Member be formally appointed to each design board relevant to the Parish and that the Unit Threshold be reduced.

Comments on Policy DE2

Farningham Parish Council (FPC) requests to be consulted at the earliest possible stage of the design process, whilst designs are being developed and not after, and that a Parish Council Member be formally appointed to each design board relevant to the Parish and that the Unit Threshold be reduced.

Comments on Policy NE1

Farningham Parish Council (FPC) supports the intention of Policy NE1 to protect and enhance the district's National Landscape and wider natural environment.

FPC considers that greater emphasis should be placed on the importance of views to and from the Kent Downs National Landscape, particularly given the prominence of Pedham Place as a highpoint within the landscape. The impact of development should be assessed not only within the National Landscape, but also on sites adjacent to it where development may harm landscape setting, tranquillity, or long-distance views across the Darent Valley.

FPC strongly opposes the proposed release of PED1 (Pedham Place) from the National Landscape and Green Belt. FPC does not consider that the modest housing shortfall constitutes exceptional circumstances, nor that any public interest case has been demonstrated. Development at PED1 would cause substantial harm to the Kent Downs National Landscape and conflict directly with the intentions of Policy NE1 and the relevant paragraphs of the NPPF (including paras. 142, 189 and 190).

Comments on Policy BW1

Farningham Parish Council reiterates the concerns raised under Policy NE1, as the sensitivity of the Kent Downs National Landscape is closely linked to the area's ecological and biodiversity value.

FPC requests that BW1 more explicitly recognises the contribution of open landscapes and farmland habitats around Pedham Place to wider ecological networks. These areas form part of the Darent Valley's wildlife corridors, supporting species that rely on connected chalk grassland, hedgerows, and open-field habitats. Development at PED1 risks fragmenting these networks and causing irreversible harm to protected and priority species.

Given this ecological sensitivity, FPC does not consider that exceptional circumstances have been demonstrated to justify the release of PED1, nor that the biodiversity impacts can be mitigated to an acceptable degree.