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Your ref: Plan 2040
Email: rebecca.burnhams@quod.com
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Hannah Gooden
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Argyle Road
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Dear Hannah,

Sevenoaks District Council Plan 2040 Regulation 18 Draft – Informal representations on behalf of Wasps Rugby Football Club

I am writing on behalf of Wasps Rugby Football Club (“WRFC”) in advance of the forthcoming consultation on the Regulation 18 version of Sevenoaks District Council (“SDC” or “the District”) Plan 2040 which we understand will be open for consultation from 31st October 2023.

WRFC are new to the District and have not submitted representations to the previous consultation(s) on the emerging Plan 2040 or the previously withdrawn Local Plan. This letter therefore seeks to provide some background to WRFC, their interest in the District, some high level comments on a site previously promoted as a ‘broad location for growth’ and details of a site that has not previously been promoted through the Local Plan.

Background

Wasps Rugby Football Club

WRFC are a founding member of the Rugby Football Union. They were originally established in 1867 and have grown into a global brand over the years winning the premiership title 6 times and the European Cup twice.

Along with a number of other premiership and championship rugby clubs, the Club unfortunately went into administration in October 2022. The assets and IP of the company was secured by HALO22, a company owned by a previous sponsor and Non-Executive Director of the Club and since 2022 a small team have been focused on the recovery of the Club with the intention of entering the Club back into a Rugby league.

The Club are currently exploring options to return to the highest level of professional rugby. This will mean that they will need a new permanent home and owing to the timescales associated with securing a purpose built facility, the Club will also need to secure a temporary home in the meantime.

The Club have historically been relatively nomadic, having taken residency in a number of grounds across London before more recently moving to High Wycombe and then Coventry. Their intention





now is to return to a location that is in relatively close proximity to London where they have a strong fan base and are easily accessible. In discussion with SDC, they have identified Sevenoaks and in particular Swanley as a potential location for their new home. Swanley offers good and quick access to London for the Club and importantly has sites and land that would be of a size capable of accommodating the requirements of a premiership rugby club.

The Club's requirements of a new home include:

- Training ground facilities including:
 - 4 x rugby football pitches
 - A gym
 - An indoor barn
 - Changing rooms
 - A medical centre and medical recovery suite
 - A sports R&D centre
 - Supporting offices
 - A restaurant and players lounge
- A new multipurpose stadium complex (24-28,000 seats) that could host sport, concerts, conferences and events; and
- A supporting hotel for visitors.

Wasps Community Foundation

Working hand in hand with WRFC is the Wasps Community Foundation, the charitable arm of WRFC.

The Foundation's vision is to use the power of sport to reach half a million people by 2023 by providing "Opportunity, Inspiration and Aspiration". Their mission is to facilitate life changing programmes through education, employability, inclusion and development. They have already used sport as a powerful tool to provide inclusive programmes to improve lives in Coventry, Warwickshire, and the West Midlands and intend to use the same tools to deliver significant community benefits to Swanley, Sevenoaks and Kent.



The Foundation's work and programmes have the ability to deliver significant benefits to all members of the community, including young people not in education, employment or training; inactive adults; special educational needs and disability; secondary and primary school ages.

The Club and Foundation intend to commence their community engagement prior to having secured permanent facilities, using the time to begin developing relationships with the local community including schools, local charities and local rugby clubs and other sports clubs.

The Sites and Plan 2040

In discussion with officers at SDC, two potential sites have been discussed that have the potential to accommodate the requirements of the Club as part of a wider mixed-use masterplan:

1. Land at Petham Court Farm
2. Land at Pedham Place Golf Course

A site location plan of each site is enclosed at **Appendix 1 and 2** of this letter.

Land at Petham Court Farm

The Land at Petham Court Farm site is located immediately south east of Swanley town on the other side of the A20. It comprises agricultural land and is bound by a railway line and the M25 on its eastern edge, an industrial estate and the A20 on its northern / northeastern boundary, smaller buildings and more agricultural fields to the south and allotments and more agricultural land to the west. Wested Lane runs through the southeastern corner of the site and provides vehicular access to the Site. There are also two Public Rights of Way that dissect the site.

This site as a whole has not previously been promoted through the Local Plan process however a small triangular shape part of the site bound along the eastern edge by the M25 and the north eastern edge by the existing industrial uses has previously been put forward for employment use (SHELAA site reference: EM4). The site appraisal notes that the site would be available in 1-5 years.

In combination with the Pedham Place Golf Course site discussed below, the site at Petham Court Farm would be well located and present a significant opportunity in assisting with the delivery of the Club's requirements. The Club are in the process of engaging with the respective land owners of this site and will keep the Council updated on their discussions.

Land at Pedham Place Golf Course

The Land at Pedham Place Golf Course is also located south east of Swanley town but separated by the A20 and M25. It is a site that has previously been promoted through the Local Plan process through two separate site appraisals. The strip of land located to the east of the M25 was put forward as part of site reference EM4 referenced above. The rest of Pedham Place Golf Course was promoted under site reference MX48 and consequently included within a 'broad location for growth' within the



Proposed Submission version (2018) of the now withdrawn Local Plan. An extract of this is enclosed at **Appendix 3** of this letter.

In terms of access, the site appraisal considered that existing access onto the A20 could be utilised, allowing for connections to Junction 3 of the M25, however an additional access would be required to serve more than 50 units. The site was identified as having capacity for c. 2,500 new homes. The site was promoted for a mix of uses including residential, leisure, employment, retail, infrastructure and open space, which are reflected in the broad location for growth.

Owing to the site's location within the AONB the site appraisal does note the AONB unit's strong objection to the proposal for development on this site. Responses from a number of other statutory consultees is also provided within the site appraisal.

The previous site promotion clearly did not have the involvement of the Club and in advance of the pending Regulation 18 consultation on the draft Local Plan the Club shared their comments on the previously drafted broad location for growth, noting that the broad location for growth wasn't considered acceptable by the Local Plan Inspector and the site is most likely going to be promoted as a site allocation in this emerging Local Plan.

Table 1.1: Table of comments on previous Broad Location for Growth (ST2-28) to inform Plan 2040 site allocation

Proposed Submission version of withdrawn Local Plan (2018) - Broad Location for Growth (ST2-28)	Suggested amendments to previous wording to inform Plan 2040	Reason for amends
No. of units – c. 2,500	Minimum residential capacity – c. 2,500	To indicate that in excess of 2,500 units could be provided
Site area (hectares) - 118	Site area (hectares) - 141	It is not clear what site area the 118 hectares relates to as the Pedham Place Golf Course site extends to 141 hectares based on our measurements – site area to be agreed.
Social and Infrastructure Community	Site requirements Residential	Change in title as this list covers all uses and requirements



Education – 2 x 2FE Primary, Secondary School, SEN school	Education provision subject to needs based assessment	Removal of reference to White Oak Leisure Centre as this does not fall within the site area boundary
Redevelopment or replacement of White Oak Leisure Centre	Green open space including playspace	More flexibility incorporated into education and health care provision so that it can respond to need
Play-space, green space, allotments	Health provision subject to needs based assessment	
Primary care hub	Hotel	
Hotel	Employment and retail	Introduction of reference to sports uses that would support the Club's intentions for this site
Transport improvements, including park and ride and 'link' bus	Sports and leisure uses including multi purpose stadium and training ground facilities with ancillary supporting uses	
Employment and retail – local centre	Transport improvements including park and ride provision to Swanley	

The suggested amendments above are intended to incorporate the necessary references to support the Club's requirements for a new training ground facility and stadium on these sites. The comments above relate specifically to the Pedham Place Golf Course allocation however it has been clear from initial discussions that Land at Petham Court Farm could act as an integral extension to this site as it would be capable of accommodating the Club's required uses separate to the wider masterplan whilst also benefitting from better access and proximity to Swanley town centre, which is important when considering the movement of visitors to a stadium facility. The Club would therefore be keen to see both sites promoted within any emerging site allocation.

Other comments provided above seek additional flexibility when it comes to determining final quantum of uses such as health and education provision. Social infrastructure should be subject to needs based assessment at the time of delivery of the proposals and not seek to be overly prescriptive within any site allocation or policy wording.

Reference to White Oak Leisure Centre has been removed as we understand this is now complete and would also fall outside of any site allocation red line.



Once the Regulation 18 consultation has commenced on Plan 2040, the Club will provide formal and more detailed comments to the emerging Local Plan and the two sites.

Summary

In summary, both sites (Land at Petham Court Farm and Land at Pedham Place Golf Course) present a huge opportunity to deliver the facilities that the Club require to enable them to operate again as a premiership club. This as part of a wider masterplan has the ability to assist SDC with much needed housing delivery in the District, which is inhibited significantly by the fact that 93% of the District is located within the Green Belt. The masterplan could also deliver crucial supporting social and community infrastructure that would also assist with the very special circumstances of this proposal. Alongside this, the work of the Club's Foundation Trust will be pivotal in facilitating community outreach and benefits that would benefit not just the community in Swanley but the wider area and District and would also form a crucial part of the very special circumstances case.

We believe that the most successful way to achieve the objectives of both the Club and SDC would be to allocate both sites as part of a formal site allocation. This would provide a policy framework that would be supportive of the proposals for these two sites as well as alleviating pressure from other greenfield sites across the District that may be less suitable in terms of their location and characteristics.

The Club will continue to work with officers at SDC, landowners, key stakeholders and the community to ensure any proposals for these two sites are developed collaboratively and respond to the needs of all parties as far as possible.

The Club consider this proposal to present a huge and exciting opportunity for both the Club and the District and look forward to continuing their discussions further with SDC.

Yours sincerely

Rebecca Burnhams
Director



Appendix 1 – Site Location Plan – Land at Petham Court Farm



Appendix 2 – Site Location Plan – Land at Pedham Place Golf Course



Appendix 3 – Broad Location for Growth (Withdrawn Local Plan (2018))

Broad location for growth			
Site Name & Reference	No. of units	Site Area (Ha)	Social and Community Infrastructure
ST2-28 Land at Pedham Place, Swanley/ Farningham/ Eynsford	c2500	118	Education – 2 x 2FE Primary, Secondary School, SEN school Redevelopment or replacement of White Oak Leisure Centre Play-space, green space, allotments Primary care hub Hotel Transport improvements, including park and ride and 'link' bus Employment and retail – local centre
<p>Reason for identification as a Broad Location for Growth:</p> <p>Site has the potential to deliver a comprehensive infrastructure offer that could assist in the regeneration of Swanley. Discussions with Infrastructure providers indicate that the infrastructure offer will benefit the local community. Whilst the proposals have the potential to perform well against sustainability objectives, further information is required. Site is located adjacent to Swanley (top tier settlement in the District), on strongly performing Green Belt and within the AONB. Taking these factors into account, land to the east of Swanley and the M25 is identified as a 'broad location' for growth. Further consideration will be given to the release of the site from the Green Belt when the Plan is next reviewed</p>			