# HORTON KIRBY AND SOUTH DARENTH PARISH COUNCIL

Parish Office, Village Hall, Horton Road, South Darenth DA4 9AZ

11th September 2026

**Minutes of the Meeting of the Parish Council held on Monday 7th September 2026 in the Village Hall, South Darenth at 7.30pm**

**Present:** Cllr I Blackamore Chair, A White Vice-Chair, , D Hollands, T Moyle C Page, D Wakefield

District: Cllr A White, L Ball
PC Joe Weatherall
Members of the Public: 12 including M Dunn from DRiPS

**In Attendance:** L Johnson Parish Clerk

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## 59 APOLOGIES FOR ABSENCE

Cllrs N Gurr, D Mitchell.

## 60 DECLARATIONS OF INTEREST

There were none.

## 61 MINUTES

The Minutes of the last meeting held 6th July 2026 were signed to confirm they are a true and accurate record of the meeting's proceedings.

## 62 CLERKS REPORT & CORRESPONDENCE

*Appendix 1*

Includes the weir at Millen Court, Horton Kirby
Maintenance of Streetlights
Hedgerows Project in conjunction with North West Kent Countryside Partnership
Mater Drivers & Passenger course – FREE – to be held in the Jubilee Hall

## 63 POLICE MATTERS

PC Joe Weatherall was pleased to report that the summer had seen fewer reports than 2025 and shoplifting had also reduced.
He was patrolling Oakview Stud Farm on a daily basis with response and traffic officers also increasing their presence. The water running down from Rays Hill to Lombard Street had also stopped.
Unfortunately burglary of plant machinery and cable theft had increased very recently. He urged everyone to report anything suspicious as it may hold the vital clue to tracking stolen items such as cars, farm machinery etc. If a crime is being committed call 999, 101 if it was not an emergency or Kent Police website https://www.kent.police.uk/ro/report/.

PC Weatherall urged residents to sign up to My Community Voice https://www.mycommunityvoicekent.co.uk/ which would keep you up to date with latest news.
Cllr Alan White thanked PC Weatherall for the excellent work he was putting into this area and is much appreciated.
The next Coffee with a Cop will be on Wednesday October 21st in the Jubilee Hall.

## 64 REPORTS FROM DISTRICT COUNCILLORS

Cllr Ball – Central Government has announced a temporary hold on Local Government Reorganisation. Local elections scheduled for May 2027 will now proceed in existing council boundaries. Most residents of Sevenoaks District council had now received their new bins.
Cllr Ball, with Cllrs Hollands & Page, had attended three separate meetings to advise and help with residents responses to SDC Local Plan, Regulation 19 consultation. The last date to reply is 17th September and Cllr Ball urged as many people as possible to take part.
Cllr White Report – *Appendix 2*

- Includes the Public Spaces Protection Order is now in place covering the River Darent from Franks Bridge, Franks Lane to(and including the whole of) Westminster field along to Station Road, south Darenth.
- SGN Road Closures – Horton Road due to open 10th September but will close from outside Horton Kirby School to Bull Hill from the 16th September to mid-October.
- Parish Council Local Plan Pop-Ups in the Village Hall
- Complaint from resident as their address was being used by a business
- Road Markings and Speed Signage
- Grandstand at the Heathside
- Coffee with a Cop Wednesday 21st October
- Food Caddy Liners are NOT available to purchase at the Parish Office

## 65 KENT COUNTY COUNCILLOR

Cllr Marc Logen: Due to August holiday there will not be a report and is still aiming to get to a Parish council meeting once every quarter, or more if time permits.

## 66 QUESTIONS FROM THE PUBLIC

There were no questions but Malcolm Dunn from DRiPS reported to council that residents in Millen Court were trying to secure the fence the other side of the river as poachers had been spotted fishing in Mill pond which is private property. One incident had been quite confrontational with the police being called to the scene. Millen Court residents were keen for the land owner – Billings – to install secure fencing.
PC Joey Weatherall advised not to confront aggressive poachers but to dial 999.

## 67 SEVENOAKS DISTRICT COUNCIL LOCAL PLAN 2027-2042 REGULATION 19 CONSULTATION *Appendix 3*

Cllr Dave Hollands proposed to approve the final draft of his representation from the Parish Council to SDC Regulation 19 Consultation. Cllr Moyle seconded Cllr White abstained and all others were in favour. It was therefore
**Resolved**: to submit Cllr Hollands 22 page in depth, well researched response to SDC. In summary, it found that the proposed allocation are unsound because they are:

- **Not justified** — the evidence does not demonstrate that directing this scale of growth to Horton Kirby and South Darenth is an appropriate spatial strategy,

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having regard to the Council's own Settlement Hierarchy and the availability of more sustainable locations.

- **Not effective** — the published evidence does not demonstrate that the education, healthcare, highway, public transport, drainage and community infrastructure necessary to support the cumulative growth is available, funded and deliverable.
- **Not consistent with national policy** — in particular, the Parish Council has serious concerns regarding the release of Green Belt/Grey Belt land in locations that have not been demonstrated to be sufficiently sustainable, the cumulative effect of multiple releases, and the loss of Grade 2 Best and Most Versatile agricultural land at ST4-44

Chair Ian Blackamore and Cllr Terry Moyle wished to publicly thank Cllr Dave Hollands for the considerable time, effort and dedication invested in representing the Parish Council throughout the SDC Local Plan Regulation 19 consultation process.
**Action:** Clerk to submit report. Add item to website and Facebook to remind residents to participate.

## 68 LOCAL NEIGHBOURHOOD PLAN

Following Cllr Hollands report in July 2026 that now that Government had withdrawn funding for Parish Councils to create a Local Neighbourhood Plan, it would cost HKSD upwards of £30,000. With the new Local Plan near completion, the village plan would hold no weight and was not worth the expenditure.
Cllr Hollands proposed to not go forward with the Neighbourhood Plan but to update the Village Design Statement which was out of date. Cllr Blackamore seconded and all were in favour. Therefore it was
**Resolve**d; that a new Village Design Statement would be produced when time allowed for the project to start.

## 69 FINANCIAL MATTERS

**Schedule of Payments** ***Appendix 4***

- Was formally received for August 2026. Payments totalling £16,153.16 were approved for authorisation. There were no questions. Cllrs White and Moyle to authorise as there was no-one else available this month.
- ***Appendix 5*** It was noted that July's payments totalling £21,663.10 was approved at the ROS Committee meeting on the 3rd August whilst full Parish Council was in recess.
- The LGA Announcement that the Local Government Pay Settlement valid 01 April 2026 to 31 March 2027 had been reached at 3.3% in pay rates and allowances, valid from 1st April 2026. Employers are encouraged to implement the increase as quickly as possible.
- Request to place an order for a 12' Christmas tree before the 1st October, to go on Paper Mill was approved for the sum of £120. Price increase would be effective from the 1st October 2026.

## 70 PLANNING

**26/01630/FUL**
The Lock Up Garages
Lombard Street
Horton Kirby
DA4 9DF

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Demolition of existing garages and structures on site and erection of 5no. two-storey dwelling houses (2 x 3 bed detached and 3 x 2 bed terraced houses). New access to serve house no.1 and altered access to serve rest of development site. Alterations to parking and new cycle spaces. Associated landscaping.
**Action:** Cllr Hollands Report:
Land at Lombard Street, Horton Kirby – Proposed five dwellings
Horton Kirby & South Darenth Parish Council supports this planning application for five new homes on Lombard Street.
The Council has backed redevelopment of this site before, and nothing in the new plans changes that view. This isn't open countryside – it's already a built-up, previously developed area with garages, hardstanding and other structures. Replacing these with well-designed homes is, in the Council's opinion, a more suitable use of the land.
The site is surrounded by existing development, so the proposal wouldn't create a new isolated development or push building further into the countryside. Instead, it would tidy up and improve an already developed patch of land.
The Council also notes that the application addresses the issues raised in earlier proposals more fully, such as noise, drainage, ecology, contamination, access and landscaping. These can be managed through planning conditions. The five new homes – a mix of two- and three-bed properties – would make a small but helpful contribution to local housing without using a fresh greenfield site.
Although the Council values the Green Belt, it considers this site to be different from open rural land. It has long supported redevelopment here and continues to do so after reviewing the latest plans.
**Action:** The Parish Council therefore asks Sevenoaks District Council to **approve** the application

**71 NEWSLETTER/EVENTS/SOCIAL MEDIA**
*Appendix 6*
Following two more Events Working Group meetings, Cllr Hollands had produced a report and recommendations for full Parish Council.
Cllr Hollands proposed the following, Cllr White seconded and all were in favour:

1. Approve an amendment to Minute 182, full Parish council April 2026 "**Resolved:** tickets to the fireworks event were to be pre-sold at £4 per person and would be available at £5 on the night "The EWG recommend all tickets to be sold at £5 per child/adult, to help cover cost of ticketing
2. Approve expenditure of £400 for barriers supplied by Danny, replacing the previously considered Safesite / First Fence arrangements.
3. Approve commercial food and drink traders being charged 15% of gross turnover for the Fireworks Event.
4. Approve a £25 charge per commercial stall for the Fireworks Event.
5. Approve no charge for charities and not-for-profit organisations.
6. Approve the purchase of SumUp machines or similar card-payment equipment for general Parish Council use, subject to obtaining an appropriate quotation and compliance with the Council's Financial Regulations.
7. Approve a £12.50 ticket price per paying child for the Christmas Santa experience.
8. Approve use of an online ticketing application and the associated 5% plus 15p per ticket charge.
9. Approve a £25 charge per commercial Christmas Market stall.
10. Approve free pitches for charities, not-for-profit organisations and community groups.
11. Approve commercial food and refreshment traders being charged 15% of gross turnover.

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12. Approve expenditure of £300 for the Snow Globe.
13. Approve expenditure of £250 for the Santa Express mini train.
14. Approve expenditure of £50 for the Rock Choir.
15. Note the current estimated cost of £400–£500 for children's gifts and the Working Group's ongoing negotiations to obtain gifts at approximately £4.50 per child.
16. Note that the Parish Council will receive £1 per photograph sold by the event photographer.
17. Authorise the Events Working Group and Parish Clerk to continue with arrangements necessary to deliver both events within the approvals and financial limits set by Full Council.

**Conclusion**

The Events Working Group considers that substantial progress has been made towards delivering both events. The fireworks arrangements have been simplified and the confirmed direct expenditure reduced to £3,281 following the revised barrier arrangement. The Christmas Bazaar has developed into a broader community event, with the Santa experience operating alongside a free-entry Christmas Market and Food Hall. The £12.50 child ticket has been set after considering actual event costs and the online ticketing charge, to ensure the core Santa experience does not operate at a loss.
The Working Group therefore recommends that Full Council approve the recommendations in this report and allow preparations to proceed to final delivery.

The Chair moved the following motion and one member of the public was unanimously voted to remain.

**Under section 1(2) of the Public Bodies (Admission to Meetings) Act 1960, the press and public be excluded from the meeting during consideration of Item 15, Kiosk Café at Westminster Field, on the grounds that publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted, namely commercial, contractual and financial matters relating to the proposed operator and delivery of the project.**

**72 KIOSK CAFÉ AT WESTMINSTER FIELD**

Councillors were given an update from the ROS Committee and were introduced to the selected person who wished to take on the project of creating a Café kiosk out of the current disused kitchen in the Pavilion in Westminster Field.
Cllr Page proposed and Cllr Blackamore seconded with all in favour of pursuing all options to enable the project to move forward.

**73 DATE OF NEXT MEETING**

Monday 5th October 2026
The meeting concluded at 8.50pm

Chair: _____ Date: _____

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## 4 CLERKS UPDATE/MATTERS ARISING

| MATTERS ARISING – CLERKS REPORT | |
|---|---|
| COMMITTEE | Parish Council |
| DATE OF MEETING | 07 September 2026 |
| UPDATED | 07 sept 26 |

**Minute 107: Materials Storage Policy and Agreement Form**
It was agreed that the Clerk should contact KALC for more information on the legalities involved prior to adopting the document.
**Action:** Clerk to contact NALC. **Awaiting reply 06 Jul.**

**Mn 142:** Write to Millen Court Management Company to point out the damage being caused to public footpaths, football pitches due to the weir not being managed. **Completed.** Acknowledgement rec'd 1st June. Chased 29 Jun 26 and fwd. to Grange management residential. Chased again as 3 months passed with no response. 07 Sept Apologised and Management will get onto Residential again.

**UPDATES**

**Local Neighbourhood Plan – Agenda Item**
Clerk to put Local Neighbourhood Plan on Agenda for full parish council **September 2026** to record final decision on this.*

**Community Speedwatch – difficult to carry out July/August/September because of the ongoing road closures.** In progress. Ten volunteers so far, SDC have speed boards July/August; Sites to be confirmed and then the police will do a Risk Assessment before it can start. LJ to contact Speedwatch officer July

**160 Streetlighting:** feedback from PC Fete sent to Cllr Gurr. Update when Cllr next available Annual Maintenance – painting of Street lamps is included in contract. Removing foliage around the post isn't.
23 need cutting back – quoted £645 + vat – Resolved October as this must be done part of Parish Councils statutory duty to maintain streetlamp whilst it is working

## 4 Ken Bonner Streetlights

Your columns are due to be painted shortly and there is pruning work that needs to be done beforehand on the following:-

Columns 13, 54, 14, 41, 8, 2, 1, 62, 55, 53, 50, 30, 31, 77, 79, 96, 97, 93, 75, 34, 35, 36 & 40.

We would currently charge £645 + Vat. to carry out this work, including disposal.

Please let me know if you would like to proceed and I'll make the necessary arrangements.

17 August 2026

With regard to the column painting, it is worth noting that the main benefit is protection of the column.

We can't paint columns that are surrounded by foliage and although the painting is, the pruning is not part of the contract.

* The project (March 2025 up to £10k) the total cost must be borne by the PC.
The current HKSD Village Design Statement is out of date and carries no weight but may be worthwhile updating.
With the SDC Local Plan 2040 coming into effect December 2026 there is no justification in spending that amount of money for something that will not be taken into consideration.
Farningham and Hartley will be able to give evidence of time taken and costs into producing a Local Neighbourhood Plan.
Another reason to not produce a LNP is the current County/District Council structure changing to Unitary Council summer 2028 with a year beforehand of transitioning, plus additional 2 years of adjustment.

**CORRESPONDENCE**

1 Given I was away for most of August and am still getting through my backlog of casework I won't have an August report for you this month.

I am still aiming to attend a meeting every quarter, or more if time permits. However, please contact me if you need any assistance with any matters.

Regards **Marc Logen**

County Councillor for Sevenoaks North & Darent Valley

Purchase of Strip of Land East Hill/Paddock Close. Site meeting held Saturday 5th September – all matters resolved and title Deed Transfer can now be signed. **To be ratified at October Meeting**

2 Lucy Sawyer-Boyd

**Partnership Officer| North West Kent Countryside Partnership**

Dear Lisa,

I hope you are well.

I am getting in touch regarding the Hedgerow Heroes project run by CPRE. Our records show that you previously expressed an interest in planting hedgerows on your land, and I wanted to check whether this is something you are still interested in pursuing.

We are currently reviewing the level of interest in the scheme and assessing how much of the requested planting we will be able to deliver this winter. To help with this process, could you please let me know whether the proposed length of hedgerow to be planted is still approximately the same as when you first registered your interest (75m)? And the address of the site where the planting will take place. If your plans have changed, any updated information would be very helpful.

The planting work will be delivered by the North West Kent Countryside Partnership (NWKCP), working with teams of volunteers. As part of our assessment, I would like to arrange a site visit within the next couple of weeks to discuss the proposal and consider the practicalities of delivering the work. This will give us an opportunity to look at the proposed planting location, access arrangements, volunteer parking, and any other factors that may influence delivery.

If you remain interested, please let me know your availability over the next few weeks and I will do my best to arrange a convenient time.

I look forward to hearing from you.

Replied Yes 4/9/26

3

I’m reaching out on behalf of the Kent County Council Safer Road User Team to explore the possibility of running our **Mature Drivers & Passenger Course** for residents in Horton Kirby & South Darenth. This free course is designed to support older road users in maintaining confidence, safety, and independence on the roads—whether as drivers or passengers. The course covers topics such as health, vision, alcohol, and hazard awareness. The session lasts approximately 1hr 30mins, during this time we look to provide refreshments and give attendees an opportunity to answer any questions they may have.

We’re keen to bring this valuable initiative to the Horton Kirby & South Darenth community and were wondering if the Town/Parish Council might be able to support us by providing access to a suitable venue. Ideally, we’re looking for a space that is accessible, comfortable, and can accommodate a minimum of 30 attendees.

If any of the Town/Parish Council’s facilities might be available for this purpose, we’d be very grateful to discuss further details and potential dates. We’re flexible and happy to work around availability.

Thank you for considering this request, and please don’t hesitate to get in touch if you have any questions or need more information.

Kind regards,

**Jack Winslade** l Safer Road Users Officer

Agenda Item 6 Cllr White District Report September 2026

July and August

**District Councillor Update**

**Public Spaces Protection Order**

The signage for the PSPO are now in place at Franks Lane, Station Road, footpath by 100 Year Wood, Pavillion at Westminster Field and also on the notice board on the Parish Office. Spare signage board were also provided and these will continue to be in place for the next three years.

Anyone witnessing antisocial behaviour are encouraged to report this to the police via 101, https://www.mycommunityvoicekent.co.uk or via https://www.kent.police.uk/ro/report/asb/asb-v3/report-antisocial-behaviour/

PC Weatherall has been attentive in supporting an elderly resident that was intimidated in their car when travelling across Franks Bridge. The driver was stopped by individuals who attempted to open the car doors but was only successful to opening the boot and thankfully it was empty and they were able to drive on. The resident was understandably distressed by this incident but has received support via Kent Police.

**Road Closures - SGN Gas Maintenance**

The SGN Gas maintenance work in Horton Kirby is progressing well from its position in Horton Road.

This first phase from Viaduct Terrace to Jacobs Lane is nearing completion. The second phase from Jacobs Lane to The Street is scheduled to take place **16 September until 6 November**.

I'm hopeful that once completed we will see anti-skid tarmac and the junction of Horton Road and The Street which has been a collision hot spot in recent years.

The diversion route for large vehicles and agricultural vehicles along Skinney Lane has resulted in a deterioration of the side of the road. A request has been put forward to SGN and KCC for consideration of road repairs. We are currently awaiting their reply.

Multiple large vehicles ignored the road signage of the diversion routes and chose to travel via Eglantine Lane or Franks Lane and then onwards around the village causing congestion along Lombard Street, Forge Lane, Rays Hill and The Street. Not only are the lanes narrow for such large vehicles there are also low hanging cables across the roads. A number of vehicles were noted to be travelling to the anaerobic digester or the solar farm and numerous requests were made by KCC and SDC for the management to ensure all their

Multiple large vehicles ignored the road signage of the diversion routes and chose to travel via Eglantine Lane or Franks Lane and then onwards around the village causing congestion along Lombard Street, Forge Lane, Rays Hill and The Street. Not only are the lanes narrow for such large vehicles there are also low hanging cables across the roads. A number of vehicles were noted to be travelling to the anaerobic digester or the solar farm and numerous requests were made by KCC and SDC for the management to ensure all their drivers were aware. This process took about three weeks to be resolved and since then the vehicles appear to be travelling along the correct route.

SGN/WCB have the details of the three bus operators (**Arriva, Go-Ahead and Brian Jones**) to ensure they are aware of the road closure and diversions to make any appropriate changes.

**Local Plan 2042 - Regulation 19**

I attended both pop up sessions on Monday 10 August. Both sessions were very well attended and residents were asking various pertinent questions. I have prepared my submission for Farningham, Horton Kirby and South Darenth which pretty much mirrors the views of the Parish Councils' and Residents. I'm aware the Parish Council will agree upon their submission at the meeting on Monday 7 September.

**Complaints**

A resident's address has been used by a business as their address in an attempt to avoid a considerable HMRC VAT debt. With help from SDC, HMRC have been alerted and confirmation has been receive the resident will not receive any further correspondence. Since then they have begun to receive parcel deliveries which are being stored until some claims them. Kent Police have been informed.

A resident has complained that after living in their property for a year they received a bill from Thames Water for over £3,500. Prior to the purchases the previous homeowners experienced leaks that were reportedly repaid. The matter was referred to Laura Trott MP officer to be taken up with Thames Water.

**Road markings and speed signage**

there are a considerable number of worn out road markings and faded speed signs around the ward.

Photographs of all of them have been shared with KCC Highways team with a request that they are renewed and replaced.

I have also highlighted that the stretch of Eglantine Lane from Saxon Place to the crossroads is not clearly signed as being a 30mph speed limit. In light of the Footpath not

**Football Shelter**

Further new graffiti has appeared on the wall of the football shelter that relates to the graffiti artist Helch - real name Michael Purdy. This structure could be discussed in future Parish Council meetings for potential improvements.

**Coffee with a Cop, Councillor and Community Warden**

A date for the above event was agreed upon to be held on Wednesday 21 October which is when the Police and Community Warden are available. It would be great to see as many councillors present as possible to hear the views and concerns of residents.

**Food Caddy liners**

The SDC website has been updated t so residents aware aware the food caddy liners aren't available to be purchased as the Parish Office. Details where they can be obtained are listed here - https://www.sevenoaks.gov.uk/buysacks

If Parish Councillors have any questions please let me know.

Many thanks, Alan

**Cllr Alan White**

Sevenoaks District Councillor for Farningham, Horton Kirby and South Darenth (9th May 2023)

**Committees:**

**Cleaner and Greener**
**Community Infrastructure Levy**
**Development and Infrastructure**
**Development Management**
**Housing and Health**
**People and Places**

**Outside Organisations:**
**North West Kent Volunteer Centre**
**Kent Downs National Landscape Forum**

**Mobile: 07841410147**
**E-mail**: Cllr.White@Sevenoaks.gov.uk

# Regulation 19 Representation for Horton Kirby & South Darenth Parish Council

## Sevenoaks Local Plan 2042
## Regulation 19 Consultation Stage

# Introduction

Horton Kirby and South Darenth Parish Council submits this representation in response to the Sevenoaks District Local Plan 2042 Regulation 19 Publication.

The Parish Council recognises that Sevenoaks District must accommodate a substantial increase in housing provision arising from national planning policy. The Parish Council does not object to the principle of meeting the District's objectively assessed housing requirement. Our objection is to the scale, distribution and deliverability of the housing proposed within the civil parish of Horton Kirby and South Darenth.

The Regulation 19 Plan proposes 482 residential units across ten sites within the Parish. The sites comprise previously developed and partially previously developed land, together with six greenfield Grey Belt allocations. The Parish Council considers that the resulting concentration of development represents a very substantial intervention in two small settlements.

The Parish Council considers that the proposed allocations are unsound because they are:

- **Not justified** — the evidence does not demonstrate that directing this scale of growth to Horton Kirby and South Darenth is an appropriate spatial strategy, having regard to the Council's own Settlement Hierarchy and the availability of more sustainable locations.
- **Not effective** — the published evidence does not demonstrate that the education, healthcare, highway, public transport, drainage and community infrastructure necessary to support the cumulative growth is available, funded and deliverable.
- **Not consistent with national policy** — in particular, the Parish Council has serious concerns regarding the release of Green Belt/Grey Belt land in locations that have not been demonstrated to be sufficiently sustainable, the cumulative effect of multiple releases, and the loss of Grade 2 Best and Most Versatile agricultural land at ST4-44.

These objections engage particularly with the soundness tests in NPPF paragraph 36(b), (c) and (d) of the December 2024 Framework.

The Parish Council's principal request is that **ST4-44** is deleted from the Plan, followed by deletion or substantial reduction of **ST3-14 and ST3-15**. The remaining allocations should also be substantially reduced so that the overall scale of development is proportionate to the settlements, their infrastructure capacity and the evidenced local housing need, with priority given to previously developed land.

# Overview of Sites Objected To

| Group | Site Ref (Reg 19) | Previous Ref | Site Name | Homes | Land Type | Policy |
|---|---|---|---|---|---|---|
| 1 | ST4-44 | SD8 | Land at Horton Road (Heathside/Skinny Lane) | 230 | Greenfield | ST4 (Grey Belt) |
| 2 | ST3-4 | SD2 | Land north of Gorringe Avenue | 14 C2 | Partial PDL | ST3 (PDL) |
| 2 | ST4-27 | SD3 | Land east of Gorringe Avenue | 8 C2 | Greenfield | ST4 (Grey Belt) |
| 2 | ST4-28 | SD6 | Land south of Victoria Drive | 6 C2 | Greenfield | ST4 (Grey Belt) |
| 2 | ST4-29 | SD7 | Land south of garages, Prince Charles Ave | 13 C2 | Greenfield | ST4 (Grey Belt) |
| 2 | ST4-36 | SD5 | Land south of Prince Charles Avenue | 40 C2 | Greenfield | ST4 (Grey Belt) |
| 3 | ST3-14 | HK1 | Land at Oakview Stud Farm | 42 | PDL | ST3 (PDL) |
| 3 | ST3-15 | HK2 | The Stables at Oakview Stud Farm | 42 | Partial PDL | ST3 (PDL) |
| 4 | ST4-37 | SD4 | Land north of Rabbits Road | 58 | Greenfield | ST4 (Grey Belt) |
| 5 | ST3-5 | SD1 | The Cottage and associated land | 29 | Partial PDL | ST3 (PDL) |

**Totals:**

- 482 proposed residential units across 10 sites
- 443 C3-equivalent units (applying the Council's SHELAA C2-to-C3 conversion: 230 + 42 + 84 + 58 + 29)
- 81 of the 482 units are C2 (over-55s retirement accommodation) at Southdowns, equivalent to 42 C3 units
- Combined site area: approximately 16.43 hectares (12.95 ha greenfield, 3.48 ha PDL/partial PDL)
- Parish population: 2,879

# Grounds of Objection

Objections are brought under the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF, December 2024):

1. **Not Effective** (NPPF para 36c) — the allocations are not deliverable over the plan period because no supporting infrastructure is identified in the Infrastructure Delivery Plan 2026-7 for Horton Kirby or South Darenth
2. **Not Justified** (NPPF para 36b) — the spatial strategy directs disproportionate growth to a Hamlet and Secondary Service Settlement, contrary to the Council's own Settlement Hierarchy 2025 and SHELAA methodology
3. **Not Consistent with National Policy** (NPPF para 36d) — Green Belt release, grey belt criteria, best and most versatile agricultural land protection, and sustainable location requirements are not satisfied
4. **Site-specific constraints** — access deficiencies, heritage impacts, contamination, and other material considerations render individual allocations unsound

# PART A:

## Parish-Wide Cumulative Representation

## Applicability

This representation applies both individually to each named allocation and cumulatively to all grouped sites. If the Inspector considers these allocations separately, the grounds set out in the site-specific representations below apply individually to each site. If the Inspector considers them together, this parish-wide representation applies cumulatively.

## Key Evidence References

This representation draws on the following final Regulation 19 evidence base documents:

- Infrastructure Delivery Plan 2026-7 (IDP) — infrastructure identification
- Sustainability Appraisal Report (SA), July 2026, AECOM — C2/C3 conversion, housing supply
- Strategic Flood Risk Assessment (SFRA) Level 2, July 2026, JBA Consulting — flood risk
- Stage 2 Green Belt Assessment, October 2025, Arup — Green Belt purpose scores
- SHELAA 2026 Appendix C — site suitability assessments and RAG ratings
- Development Briefs for all ten sites, July 2026 — site-specific constraints and requirements
- Settlement Hierarchy 2025 — settlement classifications
- Parish Housing Needs Survey, January 2022 — local housing need

# A1. The Scale of Growth Is Disproportionate

The Local Plan proposes 482 residential units (443 C3-equivalent) across ten sites in the civil parish of Horton Kirby and South Darenth. The parish population is 2,879, having declined approximately 7% from 2011 (Parish Housing Needs Survey, January 2022).

This equates to one new residential unit for every six existing residents, before occupancy is considered. Applying Sevenoaks District Council's (SDC) own SHELAA C2-to-C3 conversion, the 443 C3-equivalent units represent a scale of growth that fundamentally alters the character of two small settlements, one classified as a Hamlet, the other as a Secondary Service Settlement, in a single plan period.

The Parish Council recognises that parish-level housing need cannot be treated as a ceiling on the District's overall housing requirement.
Nevertheless, it is important evidence when considering whether the spatial distribution of development is justified and proportionate.
The issue is not that the Parish should receive no growth. The issue is whether the Council has demonstrated why 482 dwellings should be concentrated in these two settlements, when Horton Kirby is classified as a Hamlet and South Darenth as a Secondary Service Settlement, and when the infrastructure necessary to support that growth has not been demonstrated.

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# A2. Settlement Hierarchy: Inappropriate Locations for Growth

SDC's own Settlement Hierarchy 2025 classifies Horton Kirby as a Hamlet (score 15, the second-lowest tier) and South Darenth as a Secondary Service Settlement (the fourth tier) (Settlement Hierarchy 2025).

The SHELAA 2025 Methodology establishes that sites beyond 250m of a Secondary Service Settlement are not considered to be in a sustainable location (SHELAA 2025 Methodology). Every one of the ten proposed allocations is assessed in the SHELAA as "over 2km from Town or Local Centre" a RED constraint (SHELAA Appendix C, all ten site assessments), and several are assessed as "not adjacent to settlement."

The spatial strategy directs growth to the lowest tiers of the settlement hierarchy while allocating new schools, healthcare facilities, and highway improvements exclusively to higher-tier settlements. This is not an appropriate strategy, nor based on proportionate evidence (NPPF para 36b).

# A3. Infrastructure Deficit: The Allocations Are Not Effective

# Education

The Infrastructure Delivery Plan 2026-7 (the final version, replacing the October 2025 interim) identifies eight new primary schools and two new secondary schools to support Local Plan growth. These are allocated to Sevenoaks (2 primary, plus 1 secondary at the Sevenoaks Education Campus), Swanley (1 primary), Pedham Place (2 primary, 1 secondary), Edenbridge (1 primary, 1 secondary), New Ash Green (1 primary), and Fort Halstead (1 primary). Two primary expansions are identified at Dunton Green and Swanley (Downsview Primary).

Horton Kirby CEP School is listed as one of 42 state primary schools in the District, but no new schools, expansions, or capacity improvements are identified for Horton Kirby or South Darenth (IDP 2026-7). The IDP confirms that "existing secondary schools in the District have limited potential for expansion" and that "any significant increase in demand arising from new Local Plan allocations would require new provision." No such provision is planned for this area.

## Health and Social Care

The IDP identifies healthcare infrastructure projects at Sevenoaks Hospital (£464,000 CIL contribution towards Darent House integrated care) and Kemsing (Otford Medical Practice expansion). No healthcare projects are identified for Horton Kirby or South Darenth (IDP 2026-7). The IDP states that "the District's healthcare provision is already under strain" and that "pressure is expected to increase over the plan period as the District's population grows and ages."

The Parish Council is concerned, based on local knowledge and representations received from residents, that SDC has not demonstrated that existing healthcare provision could absorb the additional demand generated by 482 new units. With no health infrastructure projects identified, the allocations are not effective because the necessary supporting infrastructure is neither identified nor funded.

The Southdowns sites (81 C2 units) are age-restricted retirement accommodation. While C2 units generate less direct demand for school places, they may generate equal or greater pressure on primary care, social care, and community health services. The IDP does not assess or provide for this specific demand.

## Transport and Highways

The IDP identifies highway mitigation for Swanley/Pedham Place (M25 J3 improvement, A20/Crockenhill Lane junctions), Edenbridge (B2026/Hilders Lane), and Broke Hill (Hewitts Roundabout). No highway improvements are identified for Horton Kirby or South Darenth (IDP 2026-7).

The IDP records that 87% of households in Sevenoaks District have access to at least one car (2011 Census), compared with 80% across Kent and 74% across England. The District has "very high levels of car ownership and dependency" (IDP 2026-7). The Parish Council's local knowledge is that bus services in Horton Kirby and South Darenth are limited: Route 414 (approximately 70+minute frequency, Monday to Saturday), and no bus services on Sundays.

Without identified transport mitigation, 482 new units generating additional vehicle movements on narrow rural lanes, several of which the Parish Council's local knowledge confirms are single-vehicle-width with no pedestrian footpaths, cannot be delivered sustainably. The allocations are not effective (NPPF para 36c).

## Conclusion on Effectiveness

No named education, healthcare, or highway mitigation for Horton Kirby or South Darenth is identified in the IDP 2026-7. The IDP is described as a "live document," but this does not address the current gap in identified infrastructure. Without identified infrastructure, the allocations cannot be demonstrated to be deliverable over the plan period (NPPF para 36c).

# A4. Green Belt:

## Cumulative Release Is Not Justified

The ten sites collectively release approximately 16.43 hectares from the Green Belt (12.95 ha greenfield, 3.48 ha PDL/partial PDL). Of these:

- 127 units (4 sites) are on Previously Developed Land (PDL) allocated under Policy ST3
- 355 units (6 sites) are on greenfield land allocated under Policy ST4 (Greenfield Grey Belt)

For the PDL sites, NPPF paragraph 154(g) provides that the partial or complete redevelopment of previously developed land is not inappropriate provided it would not cause substantial harm to the openness of the Green Belt. The objection to these sites is therefore primarily on effectiveness and justification grounds rather than Green Belt principle.

For the greenfield grey belt sites, NPPF paragraph 155 sets criteria that must be satisfied for development to be "not regarded as inappropriate," including demonstrable unmet need, sustainable location, and, where applicable, the Golden Rules in paragraphs 156-157 (affordable housing, infrastructure, and green space). The cumulative release of 355 greenfield units across six sites in a Hamlet and Secondary Service Settlement raises particular concern under:

- Criterion (c): whether the development is in a "sustainable location" — all sites are over 2km from town or local centres (SHELAA RED rating)
- Paragraph 156(b): "necessary improvements to local or national infrastructure" — with no infrastructure identified in the IDP, this requirement cannot be demonstrated

## Green Belt Purpose (c): Safeguarding Countryside from Encroachment

SDC's Stage 2 Green Belt Assessment (Arup, October 2025) assessed four sub-areas around South Darenth (SD-01 through SD-04). All four are provisionally identified as grey belt because none strongly contributes to purposes (a) (checking sprawl), (b) (preventing merging), or (d) (historic town setting). However, the Assessment shows that sub-area SD-02 scores 5 (the maximum) for purpose (c) — safeguarding countryside from encroachment — and sub-area SD-04 scores 4 (Green Belt Assessment, October 2025, Appendix A.10). This means land proximate to the proposed allocations makes a strong contribution to preventing countryside encroachment, even if classified as grey belt under the NPPF definition.

Even if treated as grey belt, the strong purpose (c) performance of these sub-areas means the allocations require stronger justification, proper assessment of best and most versatile agricultural land, identified infrastructure mitigation, and full compliance with paragraph 155 criteria. SDC's evidence does not demonstrate this. The Parish Council's assessment, based on local knowledge, is that development of these open countryside parcels would represent significant encroachment that is inconsistent with the strong purpose (c) performance identified in SDC's own evidence.

## A5. Previous Local Plan Failure

SDC's previous Local Plan was found unsound in 2019 and withdrawn in November 2022 following the Planning Inspector's comments regarding unmet need and the failure of the Duty to Co-operate. The current Plan attempts to meet need by directing disproportionate growth to lower-tier settlements without the infrastructure to support it. The lessons of the previous failure, that the spatial strategy must be justified and infrastructure must be deliverable, have not been learned in respect of Horton Kirby and South Darenth.

## A6. Local Government Reorganisation: Delivery Risk

Sevenoaks District Council is to be abolished on 1 April 2028 and merged into a West Kent unitary authority. This creates a significant delivery risk: the infrastructure projects identified in the IDP for higher-tier settlements may not be delivered by the successor authority, and any infrastructure obligations secured through Section 106 agreements for Horton Kirby and South Darenth sites may be deprioritised during transition. With no infrastructure currently identified for the parish, the risk of non-delivery is compounded. The Parish Council is concerned that, in the absence of named and committed infrastructure, the allocations will be undeliverable or will be delivered without the necessary supporting services.

## A7. Suggested Modifications: Parish-Wide

1. Reduce the total allocation for Horton Kirby and South Darenth to a level consistent with the Settlement Hierarchy (Hamlet and Secondary Service Settlement)
2. Require SDC to identify specific education, healthcare, and transport infrastructure projects for Horton Kirby and South Darenth in the IDP before any allocation is confirmed
3. Commission a cumulative infrastructure capacity assessment for all ten sites, including school places, GP registrations, highway capacity, and drainage
4. Apply a phasing condition requiring infrastructure delivery to precede or accompany housing delivery, with trigger thresholds
5. Reassess the spatial strategy to direct growth to higher-tier settlements where infrastructure is identified

# PART B:

# Individual Groups
# Group 1:
# Land at Horton Road (Heathside/Skinny Lane)

## Site Details

| Attribute | Detail |
|---|---|
| Reg 19 Reference | ST4-44 |
| Previous Reference | SD8 |
| SHELAA Reference | MX/21/00013 |
| Site Area | 8.19 ha |
| Allocated Capacity | 230 residential units |
| Land Type | Greenfield |
| Policy | ST4 (Greenfield Grey Belt) |
| Delivery | Years 6-10 |
| Landowner | Hawkspare Ltd |
| Agent | DHA Planning |

## 1.1. Not Effective (NPPF para 36c)

This is the largest single allocation in the parish, 230 homes, representing 48% of all proposed units. The IDP identifies no highway improvements, no school places, and no healthcare provision for this site or the wider parish (IDP 2026-7). The development brief requires open space and play space, but no strategic infrastructure is identified.

The site is allocated for delivery in Years 6-10, yet no infrastructure projects are identified in the IDP to support it. The site is over 2km from any town or local centre. Farningham Road station is within 1100m, but no rail capacity improvements are identified. The Parish Council's local knowledge is that bus services are limited. The allocation cannot be demonstrated to be deliverable without identified infrastructure.

## 1.2. Not Justified (NPPF para 36b)

## Sustainable Location

The SHELAA assessment rates this site as RED for "Town and Local Centres" (over 2km) and RED for "Land Use" (greenfield) (SHELAA Appendix C, ST4-44). The site is adjacent to South Darenth (a Secondary Service Settlement, fourth tier) but not within it. It is not in a sustainable location as defined by SDC's own SHELAA methodology.

## Best and Most Versatile Agricultural Land

The site comprises Grade 2 (Best and Most Versatile) agricultural land. NPPF paragraph 187(b) requires planning policies to recognise "the economic and other benefits of the best and most versatile agricultural land," and paragraph 188 requires plans to "allocate land with the least environmental or amenity value." SDC has not demonstrated that poorer-quality land was considered and rejected in favour of this Grade 2 site.

## Scale

230 homes on 8.19 hectares represents a density of approximately 28 dph, which is at the lower end of the development brief range of 40-60 dph. This suggests the site area includes significant constraints that reduce developable area. The allocation may not be deliverable at the stated capacity.

# 1.3. Not Consistent with National Policy — Green Belt (NPPF para 36d)

## Grey Belt Criteria (NPPF para 155)

The site is classified as grey belt. Even accepting this classification, the development must satisfy the paragraph 155 criteria:

**(a) Would not fundamentally undermine the Green Belt purpose:** The surrounding South Darenth Green Belt Assessment (October 2025) identifies nearby sub-areas, including SD-02 and SD-04, as strongly contributing to purpose (c), safeguarding countryside from encroachment (Green Belt Assessment, Appendix A.10). SDC has not demonstrated that this allocation would avoid undermining that countryside-safeguarding function. CPRE Kent objected during consultation, arguing the site constitutes "unacceptable encroachment" and noting the Green Belt Assessment classifies the area as both strongly performing and grey belt. The Parish Council shares this concern.

**(b) Demonstrable need:** While SDC cites housing need, the Parish Housing Needs Survey identified need for 20 homes, not 230. The allocation far exceeds local need and is not targeted at meeting parish-level need.

**(c) Sustainable location:** The site is over 2km from town and local centres (RED in SHELAA, ST4-44). It is adjacent to a Secondary Service Settlement, not within it. This is not a sustainable location as defined by SDC's own evidence base.

**Golden Rules (NPPF paras 156-157):** With no infrastructure identified in the IDP, the requirement for "necessary improvements to local or national infrastructure" (para 156(b)) cannot be demonstrated.

## Footnote 7 Constraints

The site has high archaeological potential and heritage assets within 200m (South Darenth Conservation Area). The SHELAA concludes these "can be managed through the Development Brief work," but no detailed assessment has been undertaken. The presence of footnote 7 constraints requires further examination before grey belt status can be confirmed.

## Additional Constraints

- National Grid 400kV overhead transmission line and decommissioned DC cable on or adjacent to the site
- Former landfill within 250m — contaminated land assessment required
- Railway noise — Policy HW3 applies
- Grade II* listed Church of St Mary in Horton Kirby — long views affected

## 1.4. Access Constraints

The Parish Council's local knowledge is that the access via a narrow strip off Horton Road is severely constrained, and SDC has not demonstrated that a secured dedicated access route exists. The Development Brief states existing access is off Horton Road via a western access strip, but the SHELAA rates network capacity as "limited — improvements required." No highway improvements are identified in the IDP. The Parish Council's assessment, based on local knowledge, is that SDC has not demonstrated that Horton Road could safely accommodate increased traffic without mitigation.

## 1.5. Suggested Modifications

1. Delete the allocation ST4-44
2. Alternatively, substantially reduce the capacity consistent with the scale of South Darenth as a Secondary Service Settlement, with delivery contingent on identified infrastructure
3. Require a Stage 2 transport assessment demonstrating safe access and network capacity before allocation
4. Require a full BMV agricultural land assessment demonstrating no lower-quality land is available
5. Require pre-determination archaeological and heritage assessment before grey belt status is confirmed
6. Require a contamination and National Grid infrastructure strategy before allocation

# Group 2:
# Southdowns Retirement Village Sites

## Site Details

| Site Ref | Previous Ref | Site Name | C2 Units | C3 Equiv. | Area (ha) | Land Type | Policy |
|---|---|---|---|---|---|---|---|
| ST3-4 | SD2 | Land north of Gorringe Avenue | 14 | 7 | 0.28 | Partial PDL | ST3 |
| ST4-27 | SD3 | Land east of Gorringe Avenue | 8 | 4 | 0.17 | Greenfield | ST4 |
| ST4-28 | SD6 | Land south of Victoria Drive | 6 | 3 | 0.14 | Greenfield | ST4 |
| ST4-29 | SD7 | Land south of garages | 13 | 7 | 0.29 | Greenfield | ST4 |
| ST4-36 | SD5 | Land south of Prince Charles Ave | 40 | 21 | 1.08 | Greenfield | ST4 |
| **Total** | | | **81** | **42** | **1.96** | | |

**Landowner:** Southdowns Retirement Village
**Agent:** Nicholas Blythe Architects
**Use class:** C2 (over-55s retirement/supported housing)
**Delivery:** All sites Years 1-5

## 2.1. Not Effective (NPPF para 36c)

## Healthcare Pressure

All 81 units are C2 (over-55s retirement accommodation). While C2 units generate less demand for school places, they generate significant demand for healthcare and social care services. The IDP identifies no healthcare projects for Horton Kirby or South Darenth, and states healthcare is "already under strain" (IDP 2026-7). The Parish Council is concerned, based on local knowledge and resident representations, that cumulative pressure on GP registrations from the combined parish allocations would place significant unassessed pressure on existing primary care provision.

The age-restricted nature of these units means that, over time, residents will require increasing levels of primary care, community health, and social care support. No assessment of this specific demand has been undertaken in the IDP.

## Access Deficiencies

Four of the five sites require new access (ST4-27, ST4-28, ST4-29, and ST4-36 per the Development Brief). The SHELAA notes "further access information should be submitted." ST4-36 has conflicting information: the SHELAA site description states "existing access

from Skinney Lane" but the Development Brief and SHELAA conclusion state "the site does not currently benefit from an access."

No highway improvements are identified in the IDP for these sites. The Parish Council's local knowledge is that South Darenth' s narrow lanes are not designed for increased vehicle movements.

## Mismatch with Housing Need

The Parish Housing Needs Survey identified need for 7 older persons downsizer units (Parish Housing Needs Survey, January 2022). The allocation of 81 C2 units exceeds this identified need by a factor of 12. The SA confirms these 81 units count as only 42 C3-equivalent in the housing supply evidence (SA Report, July 2026, para 9.9.3). They do not meet general market or affordable family housing need and are age-restricted, limiting occupancy to over-55s.

# 2.2. Not Justified (NPPF para 36b)

## Fragmented Greenfield Release

Four of the five sites (ST4-27, ST4-28, ST4-29, ST4-36) are greenfield allocations under Policy ST4 (Greenfield Grey Belt). Collectively, these four sites release 1.68 hectares of greenfield Green Belt land for 67 C2 units (34 C3-equivalent). The fragmentation of this release across four small sites is not an appropriate strategy when compared to consolidating development on the single PDL site (ST3-4).

The Parish Council is concerned that ST4-36 is joined to site HO/21/00174, which was classified as unsuitable due to its greenfield status. SDC has not explained why adjacent greenfield land is unsuitable while this site is suitable.

## Sustainable Location

All five sites are rated RED for "Town and Local Centres" (over 2km) in the SHELAA (SHELAA Appendix C, ST3-4, ST4-27, ST4-28, ST4-29, ST4-36). All five are rated RED for "Settlement Classification" (not adjacent to settlement) (SHELAA Appendix C). The SHELAA conclusions state the sites are "sustainably located for access to key services and facilities in South Darenth," but this assertion is not supported by the RED ratings the sites are not within the settlement.

## Agricultural Land

ST4-27 is entirely Grade 2 (Best and Most Versatile) agricultural land. ST4-29 is 50% Grade 2 (SHELAA Appendix C). NPPF paragraph 187(b) requires recognition of the benefits of BMV land, and paragraph 188 requires allocation of land with the least environmental or amenity value. SDC has not demonstrated that poorer-quality land was considered and rejected.

## 2.3. Not Consistent with National Policy Green Belt (NPPF para 36d)

ST3-4 is partially previously developed land. Under NPPF paragraph 154(g), the partial or complete redevelopment of previously developed land is not inappropriate provided it would not cause substantial harm to the openness of the Green Belt. The Green Belt objection to this site is therefore limited. The objection to ST3-4 is primarily on effectiveness and justification grounds.

## ST4-27, ST4-28, ST4-29, ST4-36 (Greenfield Grey Belt — para 155)

These four sites are greenfield grey belt. Under paragraph 155, development must satisfy the paragraph 155 criteria:

**(a) Would not undermine Green Belt purpose:** The surrounding South Darenth Green Belt Assessment (October 2025) identifies nearby sub-areas, including SD-02 and SD-04, as strongly contributing to purpose (c). Release of four separate greenfield parcels fragments the Green Belt and contributes to cumulative encroachment. SDC has not demonstrated that these allocations would avoid undermining that countryside-safeguarding function.

**(c) Sustainable location:** All sites are over 2km from town/local centres (RED in SHELAA) and not adjacent to the settlement (RED in SHELAA).

**Golden Rules (NPPF paras 156-157):** No infrastructure is identified in the IDP. The requirement for "necessary improvements to local or national infrastructure" (para 156(b)) cannot be demonstrated.

## Footnote 7 Constraints

Four of the five sites (ST3-4, ST4-27, ST4-28, ST4-36) have footnote 7 constraints (archaeological potential) identified in the SHELAA. ST4-29 is the exception — footnote 7 constraints are stated as "not considered to apply." For the other four, the SHELAA concludes these constraints "can be managed through Development Brief work," but no detailed assessment has been undertaken to confirm grey belt status.

# 2.4. Suggested Modifications

1. Substantially reduce greenfield grey belt allocations (ST4-27, ST4-28, ST4-29, ST4-36)
2. Retain ST3-4 (PDL) at a reduced capacity consistent with the older persons downsizer units identified in the Parish Housing Needs Survey, subject to:
    - Noise assessment (proximity to railway)
    - Archaeological pre-determination assessment
3. Alternatively, if greenfield sites are retained, require:
    - A cumulative transport assessment for all five sites
    - A healthcare capacity assessment specific to C2/over-55s demand

4. Require SDC to demonstrate why site HO/21/00174 (adjacent to ST4-36) was deemed unsuitable while ST4-36 is suitable

# Group 3
# Oakview Stud Farm (ST3-14 and ST3-15)

## Site Details

| Site Ref | Previous Ref | Site Name | Homes | Area (ha) | Land Type | Policy |
|---|---|---|---|---|---|---|
| ST3-14 | HK1 | Land at Oakview Stud Farm | 42 | 1.12 | PDL (brownfield) | ST3 |
| ST3-15 | HK2 | The Stables at Oakview Stud Farm | 42 | 1.13 | Partial PDL | ST3 |
| **Total** | | | **84** | **2.25** | | |

**Settlement:** Horton Kirby (Hamlet, score 25 — second-lowest tier)
**Delivery:** Both sites Years 1-5
**No site promoter named in the documents**

## 3.1. Not Effective (NPPF para 36c)

## No Infrastructure

The IDP identifies no education, healthcare, or highway projects for Horton Kirby. With 84 new homes in a Hamlet with one primary school (Horton Kirby CEP School) and no identified capacity improvements, the allocation is not deliverable with supporting infrastructure.

## Surface Water Flood Risk

The SHELAA assessment for ST3-14 states: "Strategic Flood Risk Assessment Level 2 identifies surface water flood issues on this site; site-specific guidance must be followed" (SHELAA Appendix C, ST3-14). The SFRA Level 2 (July 2026) screened 103 sites and identified 20 Red sites requiring detailed assessment. The presence of surface water flood issues on ST3-14 requires further investigation before the allocation can be confirmed as deliverable.

## Contamination

Both sites require contaminated land assessment due to previous commercial/storage use, with asbestos concerns raised by respondents. The Parish Council's local knowledge is that the sites have a history of commercial and equestrian use that may have left residual contamination. Remediation costs may affect viability and deliverability.

## 3.2. Not Justified (NPPF para 36b)

### Settlement Hierarchy

Horton Kirby is classified as a Hamlet, the second-lowest tier in the Settlement Hierarchy 2025 (Settlement Hierarchy 2025). The SHELAA assessment for ST3-14 states: "Not considered a sustainable location (hamlet, open countryside)" (SHELAA Appendix C, ST3-14). Both sites are over 2km from town or local centres (RED) and within 2km of Farningham Road station (AMBER).

The combined allocation of 84 homes at this location (42+42) represents significant growth for a Hamlet classified as "not a sustainable location" by SDC's own SHELAA assessment. When combined with other parish allocations, the cumulative total of 482 far exceeds any reasonable threshold for a settlement of this size.

### Cumulative Impact

The two sites are adjacent to each other, and the SHELAA describes ST3-15 as bridging "the gap between Horton Kirby urban confines and site HK1" (SHELAA Appendix C, ST3-15). The combined development of 84 homes at this location would effectively extend Horton Kirby along Lombard Street, changing the character of the Hamlet. CPRE Kent noted concern about "cumulative numbers on the adjacent site" during consultation. The Parish Council shares this concern and considers that the combined development would erode the settlement edge and reduce the open gap and visual separation currently contributing to Horton Kirby's rural character.

The Plan is not justified because it does not adequately assess the cumulative effect of proposed housing allocations against the existing baseline of approximately 171 hectares of recent solar farm development on Grade 2 Best and Most Versatile agricultural land in the parish’s Green Belt. Sites ST3-14 and ST3-15 lie approximately 600 metres from those solar schemes. The Council has not demonstrated that it has considered the combined landscape, openness, agricultural-land and settlement-separation effects, or that less harmful alternatives have been exhausted.

## 3.3. Green Belt (NPPF paras 154, 155)

Both sites are allocated under Policy ST3 (PDL). ST3-14 is brownfield (PDL), and ST3-15 is partially brownfield. Under NPPF paragraph 154(g), the partial or complete redevelopment of previously developed land is not inappropriate provided it would not cause substantial harm to the openness of the Green Belt. The Green Belt objection to these sites is therefore limited.

However, the following points apply:

- Both sites are classified as grey belt, but footnote 7 constraints (heritage/archaeological) are present. The SHELAA concludes grey belt status based

on PDL, but the heritage constraints (Conservation Area within 200m, 4-5 listed buildings) require further assessment before grey belt status can be confirmed.
- Even if PDL development is "not inappropriate," the allocation must still satisfy the effectiveness and justification tests. With no infrastructure identified and the site in a Hamlet classified as "not a sustainable location" by SDC's own assessment, the allocation is not justified.

## 3.4. Heritage Constraints

- ST3-14: Within 200m of Horton Kirby Conservation Area and 4 listed buildings
- ST3-15: Within 200m of Horton Kirby Conservation Area and 5 listed buildings
- Both: High archaeological potential — pre-determination assessment required (Policy HEN3)
- Both: Footnote 7 constraints present (potential heritage impacts)

The development of 84 homes in the setting of a Conservation Area and multiple listed buildings, in a Hamlet with strong rural character, requires careful assessment that has not been undertaken at the allocation stage. The Parish Council is concerned that the scale of development proposed would cause harm to the significance of these designated heritage assets and the character of the Conservation Area.

## 3.5. Access Constraints

Both sites access off Lombard Street, described as having "limited capacity" on the transport network. The Parish Council's local knowledge is that Lombard Street is a narrow lane with limited visibility at key junctions. Consultation responses raised concerns about narrow country lanes, limited visibility, and increased car dependency. No highway improvements are identified in the IDP.

## 3.6. Suggested Modifications

1. Reduce the combined capacity from 84 to a number consistent with the Hamlet classification
2. Require phasing: ST3-14 first (full PDL), with ST3-15 only proceeding if infrastructure capacity is demonstrated
3. Require a combined Heritage Impact Assessment for both sites before allocation is confirmed
4. Require a contaminated land assessment and remediation strategy before allocation
5. Require surface water flood risk assessment for ST3-14 (per SFRA Level 2)
6. Require a transport assessment demonstrating safe access off Lombard Street
7. Require infrastructure triggers: no development to commence until school place and GP capacity is demonstrated

# Group 4
# Land north of Rabbits Road

## Site Details

| Attribute | Detail |
|---|---|
| Reg 19 Reference | ST4-37 |
| Previous Reference | SD4 |
| SHELAA Reference | HO/21/00172 |
| Site Area | 3.08 ha |
| Allocated Capacity | 58 residential units |
| Land Type | Greenfield |
| Policy | ST4 (Greenfield Grey Belt) |
| Delivery | Years 1-5 |
| Landowner | Southdowns Retirement Village |
| Agent | Nicholas Blythe Architects |

## 4.1. Not Effective (NPPF para 36c)

No education, healthcare, or highway projects are identified in the IDP 2026-7 for this site. The site is not adjacent to the settlement boundary — the SHELAA rates it as "Not adjacent to settlement" (RED) and "Not within urban confines" (AMBER) (SHELAA Appendix C, ST4-37). With 58 homes on a greenfield site with no identified infrastructure, the allocation is not deliverable.

## 4.2. Not Justified (NPPF para 36b)

## Sustainable Location

The SHELAA rates this site as RED for "Settlement Classification" (not adjacent to settlement) and RED for "Town and Local Centres" (over 2km) (SHELAA Appendix C, ST4-37). The SHELAA conclusion states the site is "considered sustainably located for access to key services in South Darenth," but this assertion directly contradicts the RED ratings. The site is within the "buffer" of South Darenth, not adjacent to it.

## Access Discrepancy

The SHELAA states "existing access off Rabbits Road." The Development Brief states "the site does not currently benefit from an access." The Parish Council's local knowledge is that Rabbits Road is a single-vehicle-width country lane with no pedestrian footpath. This internal inconsistency in the evidence base undermines the justification for the allocation.

## Best and Most Versatile Agricultural Land

The site is Grade 2 (Best and Most Versatile) agricultural land (SHELAA Appendix C, ST4-37). NPPF paragraph 187(b) requires recognition of the benefits of BMV land, and paragraph 188 requires allocation of land with the least environmental or amenity value. SDC has not demonstrated that poorer-quality land was considered and rejected.

## 4.3. Not Consistent with National Policy, Green Belt (NPPF para 36d)

## Grey Belt Criteria (NPPF para 155)

**(a) Would not undermine Green Belt purpose:** The surrounding South Darenth Green Belt Assessment (October 2025) identifies nearby sub-areas, including SD-02 and SD-04, as strongly contributing to purpose (c). This site lies to the North of Southdowns Retirement Village in open Green Belt. SDC has not demonstrated that this allocation would avoid undermining that countryside-safeguarding function.

**(c) Sustainable location:** RED for settlement classification and town/local centres (SHELAA Appendix C, ST4-37). Not a sustainable location per SDC's own SHELAA methodology.

**Golden Rules (NPPF paras 156-157):** No infrastructure identified in the IDP. The requirement for "necessary improvements to local or national infrastructure" (para 156(b)) cannot be satisfied.

## Footnote 7 Constraints

The site has high archaeological potential, with footnote 7 constraints identified. The SHELAA concludes these "can be managed through Development Brief work," but no detailed assessment has been undertaken.

## Additional Constraints

- Noise assessment required — adjacent to railway line (Policy HW3)
- National Grid decommissioned DC cable (Kingsnorth-Beddington) in vicinity
- NGET Overhead/Underground Cable Route present within/adjacent to site
- Natural England noted desire lines visible aerially, suggesting public recreational use

## 4.4. Landownership and Relationship to Southdowns

The landowner is Southdowns Retirement Village, and the agent is Nicholas Blythe Architects, the same promoter as the five Southdowns sites in Group 2. This site is directly adjacent to Southdowns Retirement Village. The allocation effectively extends the retirement village into open Green Belt, raising questions about the relationship between this C3 allocation and the C2 allocations on the adjacent land. The Parish Council considers that the cumulative impact of this site alongside the five Southdowns sites has not been properly assessed.

## 4.5. Suggested Modifications

1. Substantially reduce the unit on ST4-37 with delivery contingent on:
    - Resolution of the access discrepancy between SHELAA and Development Brief
    - Identified infrastructure in the IDP
    - BMV agricultural land assessment
2. Require a transport assessment demonstrating safe access via Rabbits Road
3. Require a noise assessment due to railway proximity
4. Require archaeological pre-determination assessment before grey belt status is confirmed
5. Require SDC to explain the relationship between this C3 allocation and the adjacent C2 Southdowns allocation

# Group 5
# The Cottage and Associated Land (Holmesdale Hill)

# Site Details

| Attribute | Detail |
|---|---|
| Reg 19 Reference | ST3-5 |
| Previous Reference | SD1 |
| SHELAA Reference | HO/21/00024 |
| Site Area | 0.95 ha |
| Allocated Capacity | 29 residential units |
| Land Type | Partially brownfield (mixed PDL and greenfield) |
| Policy | ST3 (PDL) |
| Delivery | Years 1-5 |
| Agent | DHA Planning (on behalf of landowner) |

## 5.1. Not Effective (NPPF para 36c)

No education, healthcare, or highway projects are identified in the IDP 2026-7 for this site. The site has a RAG rating of 18 Green, 8 Amber, 1 Red — the lowest Red count of all ten sites, suggesting fewer site-specific constraints. However, the absence of identified infrastructure remains a fundamental barrier to deliverability.

## 5.2. Not Justified (NPPF para 36b)

## Sustainable Location

The SHELAA rates this site as RED for "Town and Local Centres" (over 2km) and AMBER for "Within Urban Confines" (adjacent to South Darenth) (SHELAA Appendix C, ST3-5).

The site is adjacent to South Darenth (a Secondary Service Settlement, fourth tier), which is a more sustainable location than the Horton Kirby sites. However, it is still over 2km from any town or local centre.

## Best and Most Versatile Agricultural Land

The site is Grade 2 (Best and Most Versatile) agricultural land, though partially brownfield (SHELAA Appendix C, ST3-5). NPPF paragraph 187(b) requires recognition of the benefits of BMV land, and paragraph 188 requires allocation of land with the least environmental or amenity value. SDC has not demonstrated that poorer-quality land was considered and rejected for the greenfield portion of the site.

## Previous Allocation History

This site was previously proposed for allocation in the withdrawn Regulation 19 Plan (2018). The fact that the previous plan was found unsound and withdrawn raises questions about whether the same site can be justified in the current plan without addressing the reasons for the previous failure.

# 5.3. Green Belt (NPPF paras 154, 155)

The site is partially PDL and is allocated under Policy ST3. Under NPPF paragraph 154(g), the partial or complete redevelopment of previously developed land is not inappropriate provided it would not cause substantial harm to the openness of the Green Belt. The Green Belt objection to this site is therefore limited.

However, the site is also within a "Strong Green Belt parcel" per the SHELAA, and the Green Belt Assessment shows strong purpose (c) performance in the South Darenth sub-areas. Even if PDL development is "not inappropriate," the allocation must still satisfy the effectiveness and justification tests.

## Footnote 7 Constraints

Footnote 7 constraints are present (proximity to designated heritage asset), but the SHELAA concludes "limited impact" due to brownfield/limited impact. This assessment should be verified through a pre-determination heritage assessment.

# 5.4. Heritage Constraints

- Within setting of South Darenth Conservation Area and a listed building (within 200m of Conservation Area and 3 listed buildings)
- Contains a potential non-designated heritage asset on site
- Archaeological potential — pre-determination assessment required (Policy HEN3)
- Tree Preservation Order to the south along Holmesdale Hill

The Parish Council is concerned that development of this site, in the setting of the Conservation Area and adjacent to listed buildings, could cause harm to heritage significance that has not been assessed at the allocation stage.

## 5.5. Access Constraints

Existing access off Roman Villa Road. The SHELAA rates network capacity as having "capacity on transport network (contributions may still be sought)." However, the Parish Council's local knowledge is that there are traffic access, egress, and entrance congestion issues that pose fundamental constraints. Consultation responses from residents raised similar concerns.

## 5.6. Suggested Modifications

1. Reduce the capacity from 29 to a number consistent with the adjacent-to-settlement location and partially brownfield status
2. Require a Heritage Impact Assessment before allocation is confirmed
3. Require an archaeological pre-determination assessment
4. Require a BMV agricultural land assessment for the greenfield portion
5. Require a transport assessment addressing access/egress congestion concerns
6. Require infrastructure triggers: no development to commence until school place and GP capacity is demonstrated
7. Require SDC to explain how this site, previously proposed in the withdrawn 2018 plan, now overcomes the issues that led to the previous plan's failure

# Summary of Suggested Modifications by Group

| Group | Sites | Total Units | Primary Modification Sought |
|---|---|---|---|
| 1 | ST4-44 | 230 | Delete |
| 2 | ST3-4, ST4-27/28/29/36 | 81 C2 (42 C3 equiv.) | Substantially reduce greenfield sites |
| 3 | ST3-14, ST3-15 | 84 | Substantially reduce combined total; phase; require infrastructure triggers |
| 4 | ST4-37 | 58 | Substantially reduce with access/infrastructure conditions |
| 5 | ST3-5 | 29 | Reduce to max 15 with conditions |

# Conclusion

The Parish Council considers that the ten proposed allocations at Horton Kirby and South Darenth are not sound because:

1. **Not Effective (para 36c):** No education, healthcare, or highway infrastructure is identified in the IDP 2026-7 for Horton Kirby or South Darenth. The IDP identifies 8 new primary schools, 2 new secondary schools, healthcare projects at Sevenoaks and Kemsing, and highway mitigation at Swanley, Pedham Place, Edenbridge, and Broke Hill, but nothing for this parish. Without identified infrastructure, the allocations cannot be demonstrated to be deliverable.

2. **Not Justified (para 36b):** The spatial strategy directs 482 units to a Hamlet (Horton Kirby) and a Secondary Service Settlement (South Darenth), the lowest tiers of the settlement hierarchy. The SHELAA rates all sites as RED for distance from town/local centres. The Parish Housing Needs Survey identified need for 20 homes. The scale of growth is disproportionate and not an appropriate strategy.
3. **Not Consistent with National Policy (para 36d):** The greenfield grey belt sites (355 units across 6 sites) must satisfy the NPPF paragraph 155 criteria, including demonstrable unmet need and sustainable location. The sustainable location criterion is not met (all sites over 2km from centres, per SHELAA RED ratings). Separately, paragraphs 156-157 require "necessary improvements to local or national infrastructure" as a Golden Rule; this cannot be demonstrated without identified infrastructure in the IDP. Several sites are on Grade 2 Best and Most Versatile agricultural land (SHELAA Appendix C), and NPPF paragraphs 187(b) and 188 require recognition of BMV benefits and allocation of land with the least environmental or amenity value. The Green Belt Assessment (October 2025) identifies nearby South Darenth sub-areas with strong purpose (c) performance, requiring stronger justification even if grey belt status is accepted.
4. **Site-specific constraints:** Access deficiencies (multiple sites require new access; access discrepancies between SHELAA and Development Brief), heritage impacts (Conservation Areas, listed buildings, archaeological potential), contamination (Oakview sites), and other material considerations render individual allocations unsound without further assessment.

The Parish Council requests that the Inspector consider main modifications to delete or substantially reduce these allocations, require infrastructure identification before allocation, and redirect growth to higher-tier settlements where infrastructure is identified.

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**Evidence base documents referenced (Regulation 19, July 2026):**

- Infrastructure Delivery Plan 2026-7 (Final, July 2026)
- Sustainability Appraisal of the Sevenoaks District Local Plan — SA Report (Final, July 2026, AECOM)
- Strategic Flood Risk Assessment Level 2 (Final, July 2026, JBA Consulting)
- Stage 2 Green Belt Assessment Main Report (October 2025, Arup)
- SHELAA 2026 Appendix C — Suitable site assessments (all ten sites)
- Development Briefs for ST3-4, ST3-5, ST3-14, ST3-15, ST4-27, ST4-28, ST4-29, ST4-36, ST4-37, ST4-44 (Reg 19, July 2026)

Approved: PC Meeting 7th September 2026

Minute 67

| | | |
|---|---|---|
| Approved 7th September 2026 | Minute 67 | Clerk: L J Johnson |

**List of Payments made between 01/08/2026 and 31/08/2026**

| Date Paid | Payee Name | Reference | Amount Paid | Authorised Ref | Transaction Detail |
|---|---|---|---|---|---|
| 04/08/2026 | Sevenoaks District Council | SDC | 260.00 | LGA1972 s 133 | VH Rates |
| 04/08/2026 | Hugo fox | HUGOFOX | 20.99 | LGA1972 s 142 | Monthly silver level support |
| 10/08/2026 | Village Hall User Refund | REFUND | 300.00 | LGA1972 s133 | J Mathew BAC's damage deposit |
| 12/08/2026 | Hugo fox | HUGOFOX | 23.99 | Lga1972 s 142 | 10 x Gov.uk email addresses |
| 17/08/2026 | llloyds | LLOYDS | 3.00 | LGA1972 s 142 | monthly card charge |
| 17/08/2026 | Adobe Systems software | LLOYDS | 14.99 | LGA1972 s 142 | 74184 02 Sep to 01 Oct |
| 17/08/2026 | Amazon | LLOYDS | 29.46 | LGA1972 s133 | office - diaries files |
| 17/08/2026 | Amazon | LLOYDS | 43.47 | LGA1972 s 133 | refuse sacks/fly catchers |
| 19/08/2026 | Hugo fox | HUGOFOX | 1.79 | lga1972s142 | memory |
| 20/08/2026 | Castle Water Limited | CASTLE | 48.44 | LGA LGA1976 s 19 | 7860 Halls water bill |
| 20/08/2026 | Castle Water Limited | CASTLE | 1,020.99 | LGALGA1976 s 19 | 9707 Pavilion METER NOT CONNEC |
| 24/08/2026 | British Gas | BRITGAS | 290.80 | LGA1976 s 19 | 4655 Electricity Halls |
| 24/08/2026 | SSE Energy Solutions | SSE | 238.81 | PC Act 1957 s 3 | 3273 Streetlighting |
| 24/08/2026 | Sevenoaks District Council | SDC | 65.00 | OpenSpace1906 10 | PAvilion Rates |
| 24/08/2026 | British Gas | BRITGAS | 23.58 | lga1976s19 | 8851 electricity pav |
| 27/08/2026 | TalkTalk | TALKTALK | 51.38 | LGA1972 s 133 | 4044 telephone/WiFi August |
| 28/08/2026 | Staff Wages | WAGES | 4,669.67 | PubHlth1875LGA | Staff Wages - August |
| 31/08/2026 | HMRC | HMRC | 1,679.95 | LGA1972 s 142 | July Tax/NI |
| 31/08/2026 | Sevenoaks District Council | SDC | 470.96 | LGRatingAct199 | 4683 1/3 contirbuti PSPO Signs |
| 31/08/2026 | Streetlights | STREET | 126.00 | PCAct1957 s 3 | 16385 Column 21 East Hill |
| 31/08/2026 | NEST Pensions | NEST | 346.46 | LGA1972 s 133 | Pensions August |
| 31/08/2026 | The Play Inspection Company Lt | PLAYINSPEC | 347.40 | PubHlthAct1875s | 89080 annual playground inspec |
| 31/08/2026 | ZA Pristine Property Services | ZAPPS | 2,248.00 | LGA1972 s133 | Inv 050/051 cleaning |
| 31/08/2026 | Sports Ground Services Ltd | SGS | 170.00 | OpenSpace1906 | 0169 overmarking HS x 2 August |
| `31/08/2026 | Jubilee Hall Casual Use Refund | REFUND | 50.00 | LGA1972 s 133 | Cancellation for personal reasons |
| | Jubilee Hall Casual Use Refund | REFUND | 75.00 | LGA1972 s 133 | Cancellation for personal rea |
| 31/08/2026 | Locks 'N' Tools | LOCKS | 64.13 | LGA1972 s 133 | 053 11 x keys for halls |
| 31/08/2026 | LothLorien Landscape Services | LOTHLORIEN | 3,468.90 | PubHlthAct 1875 | 82/86 Grounds Maintenance |
| | **Total Payments** | | 16,153.16 | | |

UNITY TRUST BANK 01 - 31 JULY 2026

| | | | | |
|---|---|---|---|---|
| 01-Jul-26 | Direct Debit (SEVENOAKS DISTRICT) | 30564642 | -260 | |
| 06-Jul-26 | Direct Debit (GOCARDLESS) | Gov.Uk | -20.99 | |
| 13-Jul-26 | Direct Debit (GOCARDLESS) | HUGOFOXLTD-JTVFCKH | -23.99 | |
| 15-Jul-26 | B/P to: HMRC Cumbernauld | 875PZ00146623 | -1679.75 | |
| 16-Jul-26 | Direct Debit (LLOYDS BANK PLC) | 800000182381II7246 | -811.26 | |
| 20-Jul-26 | Direct Debit (GOCARDLESS) | HUGOFOXLTD-JTVFCKH | -1.79 | |
| 21-Jul-26 | Direct Debit (CAMPAIGN TO PROTEC) | PM1217235 | -60 | |
| 21-Jul-26 | Direct Debit (CASTLE WATER LTD) | TW5170022406 | -153.53 | |
| 21-Jul-26 | Direct Debit (CASTLE WATER LTD) | 578299 | -1469.22 | * WF Leak |
| 22-Jul-26 | Direct Debit (BRITISH GAS) | BGL0163402-0154101 | -295.28 | |
| 22-Jul-26 | Direct Debit (SSE ENERGY SUPPLY) | 0134653-DD01623834 | -224.31 | |
| 23-Jul-26 | Direct Debit (SEVENOAKS DISTRICT) | 30694697 | -65 | |
| 28-Jul-26 | Direct Debit (BRITISH GAS) | BGL0163384-0154104 | -23.06 | |
| 28-Jul-26 | July Wages | JULY WAGES | -4669.67 | |
| 30-Jul-26 | Direct Debit (TALKTALK BUSINESS) | 01507356/882 | -51.38 | |
| 31-Jul-26 | Lothlorien FA Funding | 66/26 | -366 | |
| 31-Jul-26 | Lothlorien Inv 65/26 | 65/26 | -4162.2 | |
| 31-Jul-26 | Nest July 2026 | DD Pension | -346.46 | |
| 31-Jul-26 | HMRC | DD Wages | -920.75 | |
| 31-Jul-26 | Rialtas | 33960 | -783 | |
| 31-Jul-26 | ZAPPS Cleaning | 048/49 | -2096 | |
| 31-Jul-26 | SDC License | 210202814 | -180 | |
| 31-Jul-26 | SportsGround Services | June 0162 | -789 | |
| 31-Jul-26 | SportsGround Services | Jul-26 | -879 | |
| 31-Jul-26 | PC Blinds | 1694 | -660 | |
| 31-Jul-26 | Direct Debit (NEST) | IT000001771896 | -346.46 | |
| 31-Jul-26 | Service Charge | | -13 | |
| 31-Jul-26 | SDC Dog Bins Apr - Jun | | -312 | |
| | TOTAL | | -21663.1 | |

SLCC

For Local Council Professionals

**News & Publications**

Home News LGA Announces 2026 Local Government Pay Settlement

**LGA Announces 2026 Local Government Pay Settlement**

24 August 2026

The Local Government Association (LGA), acting on behalf of the National Joint Council (NJC) for Local Government Services, has announced that agreement has been reached on the 2026 pay award for local government employees. The settlement provides for a **3.3% increase in pay rates and allowances with effect from 1 April 2026**.

The agreed pay award covers the period from 1 April 2026 to 31 March 2027, and employers are being encouraged to implement the increase as quickly as possible.

For parish and town councils, the settlement will inform the annual update to the National Association of Local Councils (NALC) salary scales. While the annual SCP values are now available through the NJC agreement, councils should note that the hourly rates customarily published by NALC are calculated separately using NALC's methodology and working-time assumptions, and also cover salaries in the range above SCP43. Consequently, any hourly rates attached to the national announcement should be treated as indicative until NALC publishes its updated salary scales.

# HORTON KIRBY & SOUTH DARENTH COUNCIL

# PLANNING APPLICATION CONSULTATION RESPONSE

| | |
|---|---|
| **Reference** | **26/01630/FUL** |
| **Site Address** | The Lock Up Garages<br>Lombard Street<br>Horton Kirby<br>DA4 9DF |
| **Proposal** | Demolition of existing garages and structures on site and erection of 5no. two-storey dwelling houses (2 x 3 bed detached and 3 x 2 bed terraced houses). New access to serve house no.1 and altered access to serve rest of development site. Alterations to parking and new cycle spaces. Associated landscaping. |
| **Support** [x] | Horton Kirby & South Darenth Parish Council supports this planning application for five new homes on Lombard Street.<br>The Council has backed redevelopment of this site before, and nothing in the new plans changes that view. This isn't open countryside – it's already a built-up, previously developed area with garages, hardstanding and other structures. Replacing these with well-designed homes is, in the Council's opinion, a more suitable use of the land.<br>The site is surrounded by existing development, so the proposal wouldn't create a new isolated development or push building further into the countryside. Instead, it would tidy up and improve an already developed patch of land.<br>The Council also notes that the application addresses the issues raised in earlier proposals more fully, such as noise, drainage, ecology, contamination, access and landscaping. These can be managed through planning conditions.<br>The five new homes – a mix of two- and three-bed properties – would make a small but helpful contribution to local housing without using a fresh greenfield site.<br>Although the Council values the Green Belt, it considers this site to be different from open rural land. It has long supported redevelopment here and continues to do so after reviewing the latest plans.<br>The Parish Council therefore asks Sevenoaks District Council to **approve** the application. |
| | **Horton Kirby & South Darenth Parish Council**<br><br>**11th September 2026** |

# EVENTS WORKING GROUP

# REPORT AND RECOMMENDATIONS TO FULL COUNCIL

| | |
|---|---|
| **Meeting** | Full Council – Monday 7 September 2026 |
| **Report** | 2026 Fireworks Event and Christmas Bazaar |
| **Prepared by** | Cllr Hollands - Events Working Group |
| **Fireworks Event** | Sunday 1 November 2026 |
| **Christmas Bazaar** | Saturday 5 December 2026 |

## Purpose of Report

The purpose of this report is to update Full Council on the progress made by the Events Working Group in planning the Parish Council's two forthcoming community events: the Fireworks Event on Sunday 1 November 2026 and the Christmas Bazaar on Saturday 5 December 2026.

The Working Group has reviewed the proposed arrangements, suppliers, activities, income opportunities and expenditure. It now seeks Full Council approval for the outstanding financial and operational matters, including admission pricing and expenditure.

The recommendations aim to provide enjoyable community events while maintaining appropriate financial control and avoiding unnecessary exposure of Parish Council funds.

## Financial Summary

| Event | Recommended price | Known/confirmed expenditure | Key financial point |
|---|---|---|---|
| Fireworks | £5 per person | £3,331 | Ticket-only break-even is approximately 657 paying attendees; additional trader income will contribute. (Last year's attendance was 1260) |
| Christmas Bazaar | £12.50 per paying child | £1,000–£1,100 | At 100 children, net ticket income after online fees is approximately £1,172.50, before other event income. |

## Fireworks Event – Sunday 1 November 2026

### Event arrangements

The event will feature a professionally provided musical fireworks display, refreshments, a bar, food, commercial and community stalls and, if a suitable operator can be secured, fairground entertainment.

The Working Group has confirmed that there will be no bonfire and that bouncy castles will not form part of the event. The Working Group is continuing to seek fairground entertainment. The Lions have been contacted regarding a possible chair-o-plane but have not yet replied.

### Insurance and safety

The Parish Council's insurer, Ecclesiastical, through Clear Insurance Management, has confirmed in writing that no additional insurance premium is due for the event.

St John Ambulance is included in the confirmed expenditure. The Working Group has also revised the barrier arrangements and agreed to use Danny as the supplier, as this is expected to be cheaper and involve less work than the previously considered Safesite or First Fence arrangements.

## Confirmed expenditure

| Item | Cost |
|---|---|
| Phoenix Fireworks – 12-minute musical display | £2,808 |
| St John Ambulance | £123 |
| Barriers – Danny | £400 |
| TOTAL | £3.331 |

Although the fireworks are already agreed, the Working Group recommends that Full Council approve the individual items of expenditure above. No additional event costs are currently known.

## Admission pricing and break-even

The Working Group recommends a flat admission charge of £5 per person. Tickets will be available online.

Against confirmed expenditure of £3,281, ticket income alone would require approximately 657 paying attendees to reach break-even.

| Paying attendees | Ticket income | Position against £3,281 expenditure* |
|---|---|---|
| 500 | £2,500 | £831 short |
| 657 | £3,285 | £46 short |
| 750 | £3,750 | £419 surplus |
| 1,000 | £5,000 | £1,669 surplus |
| 1,250 | £6,250 | £2,919 surplus |

*Before income from commercial stalls, food and drink concessions or other sources, and before any further expenditure that may subsequently arise.

## Food, bar and stalls

| Area | Arrangement |
|---|---|
| BBQ | Scouts confirmed |
| Refreshments | Fred confirmed |
| Fish and chips | Trader identified and being pursued |
| Bar | The Bull will operate the bar |
| Commercial food/drink traders | 15% of gross turnover |
| Commercial stalls | £25 per pitch |
| Charities / not-for-profit organisations | No charge |

## Card payment equipment

The Working Group has requested that the Parish Council purchase SumUp machines or similar card-payment equipment for general Council use. The intention is that this becomes a reusable Council asset for future events and other appropriate Council activities, rather than an event-specific purchase.

# Christmas Bazaar – Saturday 5 December 2026

## Event concept and layout

The Christmas Bazaar is intended to provide a wider community Christmas experience incorporating a Santa experience, Christmas Market, Christmas Food Hall, entertainment and a Grand Raffle.

| Area | Proposed use |
|---|---|
| Bar Room / Parish Room | Santa's Grotto |
| Village Hall | Christmas Market – local crafters, community groups and small businesses |
| Jubilee Hall | Christmas Food Hall and Grand Raffle |

Real Christmas trees are being loaned free of charge, and existing Parish Council grotto decorations will be used.

## Santa experience

The Working Group recommends a ticket price of £12.50 per paying child. The price was reviewed following the costing exercise, which showed that a lower price was becoming too close to resulting in a loss.

Each paying child will receive a Santa experience including a ride on the Santa Express and a Christmas gift. Photographs are not included in the ticket price. Children's craft activities have been removed from the event.

Accompanying adults will be admitted free of charge. The wider Christmas Market will also be free to enter, allowing residents to attend the community element of the event without purchasing a Santa ticket.

## Capacity and timed tickets

The Santa experience will operate on a timed-ticket basis. The working assumption is approximately 100 children, with an absolute maximum of 110 tickets.

The mini train can carry 12 people, including accompanying adults. The Working Group's original calculation allowed approximately five minutes per child, equivalent to around 12 children per hour. Advance ticketing will allow the Council to manage capacity and minimise excessive queuing.

## Christmas costs

| Item | Cost/position |
|---|---|
| Snow Globe inflatable | £300 |
| Santa Express mini train | £250 |
| Rock Choir | £50 |
| Children's gifts | £400–£500 currently estimated |
| Village Hall hire | £0 – confirmed free of charge |
| Christmas trees | £0 – loaned |
| Grotto decorations | £0 – already owned |
| Known total | £1,000–£1,100 |

The Working Group is in discussion with a supplier regarding discounted gifts at approximately £4.50 per child. The final gift cost will therefore depend on the outcome of those discussions.

## Online ticketing costs

Christmas tickets will be sold through an online ticketing application charging 5% of the ticket price plus 15p per ticket.

At a £12.50 ticket price, the estimated charge is £0.775 per ticket, leaving approximately £11.725 net per ticket before other event costs.

### Christmas ticket financial analysis

| At 100 paying children | Amount |
|---|---|
| Gross ticket income | £1,250.00 |
| Estimated online ticket charges | £77.50 |
| Net ticket income | £1,172.50 |
| Known costs – lower gift estimate | £1,000.00 |
| Indicative surplus | £172.50 |
| Known costs – higher gift estimate | £1,100.00 |
| Indicative surplus | £72.50 |

This analysis relates to ticket income against currently identified direct costs only. It does not include additional potential income from commercial stalls, food and refreshment commissions, the Grand Raffle, photographs or Snow Globe use by visitors without Santa tickets.

### Christmas Market and other income

| Income source | Proposed arrangement |
|---|---|
| Commercial market stalls | £25 per pitch |
| Charities / not-for-profit organisations | No charge |
| Food/refreshment traders | 15% of gross turnover |
| Grand Raffle | Planned; prizes being sourced |
| Photography | Parish Council receives £1 per photograph sold |
| Snow Globe | Included in Santa ticket; charge proposed for visitors without Santa tickets |

The Working Group is planning for approximately 25 market stalls. If all 25 were commercial paying stalls, the resulting stall income would be £625.

## Financial Risk and Rationale for Pricing

The Working Group has tried to balance affordability with the Council's responsibility to manage public funds.

For the Fireworks Event, the £5 admission charge is intended to keep the event accessible while providing a realistic route to covering the confirmed £3,281 direct expenditure through attendance, supplemented by income from commercial traders.

For the Christmas Bazaar, the Working Group reviewed the ticket price after the costing exercise showed that a lower price was becoming too close to making a loss. At £12.50, the Santa ticket produces approximately £1,172.50 after the online ticket charge. At 100 children, this provides £1,172.50 of net ticket income against currently identified direct costs of £1,000–£1,100.

The Working Group therefore considers £12.50 to be the appropriate minimum ticket price at this stage. The additional income streams provide further financial protection but should not be relied upon to make the core Santa ticket viable.

## Recommendations to Full Council

1. Approve an amendment to Minute 182, full Parish council April 2026 "**Resolved:** tickets to the fireworks event were to be pre-sold at £4 per person and would be available at £5 on the night "The EWG recommend all tickets to be sold at £5 per child/adult, to help cover cost of ticketing

2. Approve expenditure of £400 for barriers supplied by Danny, replacing the previously considered Safesite / First Fence arrangements.
3. Approve commercial food and drink traders being charged 15% of gross turnover for the Fireworks Event.
4. Approve a £25 charge per commercial stall for the Fireworks Event.
5. Approve no charge for charities and not-for-profit organisations.
6. Approve the purchase of SumUp machines or similar card-payment equipment for general Parish Council use, subject to obtaining an appropriate quotation and compliance with the Council's Financial Regulations.

7. Approve a £12.50 ticket price per paying child for the Christmas Santa experience.
8. Approve use of an online ticketing application and the associated 5% plus 15p per ticket charge.
9. Approve a £25 charge per commercial Christmas Market stall.
10. Approve free pitches for charities, not-for-profit organisations and community groups.
11. Approve commercial food and refreshment traders being charged 15% of gross turnover.
12. Approve expenditure of £300 for the Snow Globe.
13. Approve expenditure of £250 for the Santa Express mini train.
14. Approve expenditure of £50 for the Rock Choir.
15. Note the current estimated cost of £400–£500 for children's gifts and the Working Group's ongoing negotiations to obtain gifts at approximately £4.50 per child.
16. Note that the Parish Council will receive £1 per photograph sold by the event photographer.
17. Authorise the Events Working Group and Parish Clerk to continue with arrangements necessary to deliver both events within the approvals and financial limits set by Full Council.

## Conclusion

The Events Working Group considers that substantial progress has been made towards delivering both events. The fireworks arrangements have been simplified and the confirmed direct expenditure reduced to £3,281 following the revised barrier arrangement.

The Christmas Bazaar has developed into a broader community event, with the Santa experience operating alongside a free-entry Christmas Market and Food Hall. The £12.50 child ticket has been set after considering actual event costs and the online ticketing charge, to ensure the core Santa experience does not operate at a loss.

The Working Group therefore recommends that Full Council approve the recommendations in this report and allow preparations to proceed to final delivery.

## Quick Financial Reference

| | **Fireworks** | **Christmas** |
|---|---|---|
| Date | 1 November 2026 | 5 December 2026 |
| Recommended admission | £5 per person | £12.50 per paying child |
| Target capacity | Not specified | Approx. 100; maximum 110 children |
| Confirmed/known direct costs | £3,281 | £1,000–£1,100 |
| Ticketing | Online tickets proposed | Online app: 5% + 15p/ticket |
| Commercial stalls | £25 | £25 |
| Charities/not-for-profit | Free | Free |
| Food/drink commission | 15% gross turnover | 15% gross turnover |
| Other income | Bar, food/drink and stalls | Raffle, photos, Snow Globe, food/drink and stalls |