

BADGERS MOUNT PARISH COUNCIL

COMMENTS ON SDC SUBMISSION VERSION OF LOCAL PLAN CONSULTATION JANUARY 2019

FINAL VERSION AS SUBMITTED 2/2/2019

GENERAL

1. THE DOCUMENTS

JG has a hard copy of the main policy document and 3 minor additional draft SPDs (Affordable Housing, Review Panel & Development in the Green Belt). Other associated documents, appendices, site details etc have to be viewed electronically on line.

2. HOW DO WE RESPOND?

SDC prefer that comments are made on each section of the policy and each site in the comment box when viewed on line. Alternatives are email or post (forms found at the foot of the consultation "home page", which ask the same questions as the online version, just a different layout).

Comments made online have to use the **standard form** provided which has the **following questions:-**

- A** Do you consider the plan is sound?
- B** Do you consider the plan is legally compliant?
- C** Do you consider the local plan is compliant under the duty to co-operate?
- D** If you consider the local plan is unsound, indicate your reasons. *(Tick boxes, then go to E)*
- E** Please provide your reasons below.
- F** Please set out what modification(s) you consider necessary to make the plan legally compliant or sound, having regard to the matters you have identified.
- G** If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
- H** Why do you feel it is necessary to participate at the oral part of the examination?

3. WHEN MUST WE RESPOND BY?

The consultation closes at 23.59 pm on Sunday 3rd February 2019.

4. HOW SHOULD WE RESPOND?

We don't have to comment on all / any of the policy documents or sites, or restrict comments only to sites in Badgers Mount. Preliminary comments are made below for discussion. They can then be refined, added to, deleted etc by email before submission.

POLICIES

CHAPTER 1 – A balanced strategy for sustainable growth in a constrained district

POLICY ST1

BMPC comment ref LPS 1000

A No B No C No

D The Plan is not effective

E a) The plan does not give a balanced strategy. There are a large number of sites proposed in the north of the Sevenoaks District and few in the south, contrary to the policy. Badgers Mount and Halstead in particular would be overwhelmed and the number of dwellings in the villages would be nearly doubled. The existing infrastructure of roads, public transport, utilities, medical facilities etc. struggle at present and cannot cope with such a large increase.

b) There is no overall policy in the plan integrating proposed developments with the existing infrastructure and detailing the upgrades which would be required, it is just a list of individual sites. There does not appear to be an overview considering the effects of the proposals on the existing communities. In some areas there are a number of sites in close proximity which, individually may not cause too much of a problem but cumulatively have a major impact, especially if all were developed at the same time.

c) We strongly support the inclusion of reference to Neighbourhood Plans in paragraph 1.4 but consider that their status should have more recognition and that this should be included within policy ST1 itself. The important role which Neighbourhood Plans play in future developments, including influencing housing/building densities to ensure that (a) new developments are in character with the local area, (b) that parking is properly catered for and (c) that the appropriate supporting infrastructure is put in place, must be part of the policy.

d) We support the omission of Broke Hill golf course (site MX41 in the Regulation 18 consultation) from the Plan. We concur with the conclusion of SDC that “exceptional circumstances” do not exist for this site. The existing infrastructure of roads, utilities, public transport etc. cannot cope with such a large development and would require major upgrading work. The proposed sports facilities did not appear to provide any benefit for local residents. The proposed number of houses was greater than the existing village of Halstead, and would have merged Halstead with Pratts Bottom contrary to policy ST1 and the national Green Belt policy of preventing urban sprawl. When combined with the other

proposed sites in the immediate area, it would have created a mega-settlement larger than Westerham but without any corresponding facilities and infrastructure.

F a) Add an overview of the effects of the proposals on the existing communities, infrastructure etc.

b) Add reference to the important role Neighbourhood Plans play in future developments to the policy.

G No H No

Policy ST2 – Site allocations – No comment (n/c)

CHAPTER 2 – Providing housing choices

Policy H1 – Market & affordable housing mix – n/c

Policy H2 – Provision of affordable housing – n/c

Policy H3 – Housing in rural areas – n/c

Policy H4 – Provision for the Gypsy & Traveller Community – n/c

Policy H5 – Housing density

BMPC comment ref LPS 1002

A Yes B Yes C Yes D n/c

E We support the policy in principle but consider that it has not been consistently applied. It is particularly important that the last paragraph is applied to all rural sites. Some of the development sites included in the Draft Plan do not comply with the last paragraph of the policy in that the proposed housing densities are considerably higher than in the existing surrounding area and will therefore have an unacceptable adverse impact on the existing character of the area (eg site ST2-44).

F n/c G No H No

CHAPTER 3 – Supporting a vibrant and balanced economy

Policy EMP1 – Supporting a Vibrant and Balanced Economy – n/c

Policy EMP2 – Town and Local Centres – n/c

Policy EMP3 – Tourism & Visitor Economy – n/c

CHAPTER 4 – Ensuring well-connected communities are supported by appropriate infrastructure

Policy T1 – Transport and infrastructure

BMPC comment ref LPS 1006

A Yes B Yes C Yes D n/c

E It is extremely important that the aggregate cumulative effect of all proposed developments must be taken into consideration and necessary action to upgrade deficiencies incorporated, particularly with regard to the disproportionately large scale of developments proposed for the north of Sevenoaks in general and particularly Badgers Mount and Halstead. The existing roads are already extremely congested in the rush hour periods and public transport, particularly for Badgers Mount, is very poor.

F n/c G No H No

CHAPTER 5 – Protecting, conserving and enhancing green belt, landscape and the natural environment

Policy LA1 – Landscape and AONB – n/c

Policy GB1 – Development in the Green Belt – n/c

Policy AF1 – Ashdown Forest – n/c

CHAPTER 6 – Safeguarding places for wildlife and nature

Policy WN1 – Safeguarding places for wildlife and nature – n/c

CHAPTER 7 – Ensuring new development respects local distinctiveness

Policy EN1 – Design principles – n/c

CHAPTER 8 – The historic environment

Policy HEN1 – Historic environment – n/c

Policy HEN2 – Heritage assets – n/c

CHAPTER 9 – Climate change, flooding and healthy communities

Policy HE1 – Health, wellbeing and air quality – n/c

Policy CC1 – Climate change, flooding and water management – n/c

CHAPTER 10 – Leisure and open spaces

Policy OS1 – Open space, sport and leisure – n/c

APPENDIX 1 – Guidance for design principles

BMPC comment ref LPS 1009

A No **B** Yes **C** Yes **D** n/c

E In all areas, and particularly rural areas, public transport is declining so residents are more reliant on car use. Parking standards (number of spaces provided) therefore need to be increased to meet these modern requirements. At least 1 parking space per bedroom with a minimum of 2 should be a starting basis, and provision to accommodate modern cars which are generally larger, particularly wider, than when the KCC standards were set over 10 years ago. Parking provision should generally be within the curtilage of each house which will facilitate access to charging points for electric vehicles and keep streets uncluttered and provide free access for delivery vehicles, emergency services etc.

F Add that while the KCC standards for the number of parking spaces may be acceptable in urban areas, in rural areas there should be at least 1 parking space per bedroom with a minimum of 2.

G No **H** No

APPENDIX 2 – Housing and mixed use allocations maps and development guidance

(Comments to be made on individual sites)

a) Sites within Badgers Mount

Site ST2 – 43 – Chelsfield Depot, Shacklands Road (100 houses @ 30 DPH, years 11 – 15)

BMPC comment ref LPS 1010

A Yes **B** Yes **C** Yes **D** n/c

E We support redevelopment of the site, but we believe that the density is still too high as it would be contrary to policies EN1 and H5. It would NOT respect the character of the local area. The site must be fully integrated with the existing community, and the opportunity taken to provide recreational facilities for all residents of Badgers Mount.

There is no evidence that the existing infrastructure of utilities, roads etc can accommodate the development without major improvements.

F n/c **G** No **H** No

Site ST2 – 45 – Calcutta Club & Polhill Business Centre (66 units @ 40 DPH, years 6 – 10)

BMPC comment ref LPS 1015

A Yes **B** Yes **C** Yes **D** n/c

E While supporting redevelopment of the site, we also favour retention of some employment. The agent for the Polhill Business Centre part of the site submitted a proposal for a new business centre at the southern part of the site in the Regulation 18 consultation which appears to be achievable and we would support. This is a remote rural site with no local facilities or public transport and does not have any nearby existing residential areas. The housing density should therefore be significantly reduced to comply with Policies EN1 and H5.

F This site should be scheduled as mixed use, not residential, at a lower density.

G No **H** No

b) Sites in Halstead

Site ST2 – 44 – Land west of roundabout (27 houses @ 50 DPH, years 1 – 5)

BMPC comment ref LPS 1012

A Yes **B** Yes **C** Yes **D** n/c

E This is a rural site, with only a small number of existing houses at a low density adjacent to it. We believe that the maximum number of units for this site is about 10 or 11, a similar density to Crest Close a short distance away which has 9 houses on a slightly smaller similar shaped area. To have 27 would be contrary to policies EN1 and H5 as it would NOT respect the character of the local area. Careful consideration must be given to the access as it is so close to the roundabout.

F The density and number of dwellings must be reduced.

G No **H** No

Site ST2 – 56 – Oak Tree Farm (37 units @ 30 DPH, years 6 – 10)

BMPC comment ref LPS 1016

A Yes B Yes C Yes D n/c

E The site is remote from any other residential area and is a long way from local facilities and public transport. Any development should be low density to reflect the rural area and comply with policies EN1 and H5.

F The density and number of dwellings must be reduced.

G No H No

Site ST2 – 57 – Fort Halstead (300 additional units @ 40 DPH, years 6 – 10)

BMPC comment ref LPS 1027

A No B Yes C Yes

D The Local Plan has not been positively prepared. The Local Plan is not effective.

E When outline permission was given for 450 houses, it was considered to be the maximum the site and its access road could accommodate, and it was a condition that the Star Hill entrance must only be for buses and emergency services. The proposed addition of an extra 300 houses and making the Star Hill entrance a fully functioning access point for all vehicles contravenes that permission and most policies of this draft Plan including T1, Transport and Infrastructure, LA1 & GB1, protecting the Landscape, AONB and Green Belt, EN1, respecting local distinctiveness and WN1, safeguarding places for wildlife and nature. The density proposed contravenes policies EN1 and H5.

The creation of what is effectively a new village which is larger than nearby existing villages but without facilities and infrastructure is unacceptable. It would necessitate major improvements to the existing infrastructure of roads, utilities etc.

F n/c G No H No

APPENDIX 3 – Employment allocations maps and development guidance

(Comments to be made on individual sites)

No new employment-only sites in Badgers Mount or Halstead.

APPENDIX 4 – Gypsy and Traveller allocations maps and development guidance

(Comments to be made on individual sites)

No sites in Badgers Mount.

Site in Halstead

Site H4 – 4 – Station Court, London Road (4 new pitches, years 1 – 5)

n/c