

BADGERS MOUNT PARISH COUNCIL

COMMENTS ON SDC DRAFT LOCAL PLAN CONSULTATION JULY 2018

Comments submitted to SDC 10 September 2018 on the Draft Local Plan

A - POLICIES

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

Executive Summary 1 – Finding Places for New Homes.

BMPC comment – We support SDC policy that building on undeveloped land in the Green Belt must only be considered as a last resort after all other options (brownfield and non Green Belt sites) have been exhausted. Change of use from employment to residential should only occur where the site is shown to be no longer viable for employment. The government has said that 13,960 new homes are needed. Is this figure based on local need? Does this agree with SDCs own assessment of local need? Have SDC challenged this figure? Your own figure (page 11) says that the population is expected to grow by more than 20,000 (ONS) over the plan period. As the average household has about 2.5 members this would only require 8,000 houses, not 13,960 which could accommodate about 35,000 people.

Policy 1 – Balanced strategy for growth in a constrained district

BMPC comment – The sites outside existing towns included in the plan are disproportionately located in the north of the district. Halstead and Badgers Mount in particular are very heavily targeted with about 14% of all dwellings proposed in the consultation. The proposals would more than treble the size of Halstead and double the size of Badgers Mount. Such massive increases would overwhelm the existing facilities in the area. This is hardly a “Balanced Strategy”. This would have the effect of negating the stated purpose of the Green Belt to provide a buffer between Greater London and the rural areas of Sevenoaks, and virtually merge all the villages into one thus losing their historic identities. Badgers Mount Parish Council is at the early stage of consulting with the community to produce its own Neighbourhood Plan.

Policy 2 – Housing and mixed use site allocations

BMPC comment – Site HO328 is actually in Halstead although listed as Badgers Mount. We believe that site HO368 should be a mixed development retaining some employment on the site, particularly the office and hotel/diner, a facility which is very scarce in the area. There is very little employment in the area and loss will force residents to commute greater distances.

2 – Protecting, conserving and enhancing Green Belt, landscape and the natural environment

Executive Summary 2 – Protecting our Countryside

BMPC comment – none

Policy 3 – Landscape & AONB

BMPC comment – We fully support this policy as the AONB makes a valuable contribution to the distinctive character of the district, and the protection it provides must be maintained.

Policy 4 – Development in Green Belt

BMPC comment – We fully support the NPPF definition of the Green Belt function as detailed in paragraph 2.4.

The Arup report on the Green Belt dated January 2017 stated that almost all of the rural areas of Sevenoaks performed the Green Belt purposes strongly, and Halstead achieved one of the highest scores. The large amount of development put forward for Halstead and Badgers Mount, approximately 14% of all the dwellings proposed in the consultation, will destroy this assessment.

We attach the highest importance to retention of the Green Belt, particularly in relation to prevention of the outward spread of Greater London. Some of the proposed sites will do just the opposite, particularly MX41, Broke Hill Golf Club, resulting in the villages of north Sevenoaks becoming one big conurbation without the facilities a “proper” town would have.

3 – Safeguarding places for wildlife and nature

Executive Summary 3 – Looking after our Wildlife

BMPC comment – none

Policy 5 –Ashdown Forest

BMPC comment – none

Policy 6 – Safeguarding places for wildlife and nature

BMPC comment – We support this policy. However there does not appear to be a map showing the various designated areas. While supporting the policy, it would be very useful to know where the areas are.

4 – Ensuring well connected communities are supported by appropriate infrastructure

Executive Summary 4 – Improving Health, Schools and Transport

BMPC comment – Health, school and transport infrastructure facilities are already stretched to near breaking point. Wherever large developments are proposed, these facilities must be augmented to bring them up to appropriate modern standards. E.g. larger GP surgeries which can take some of the load away from hospitals; schools built locally so that children don't have to travel long distances. There is no mention of whether utilities – electricity, gas, water, drainage, broadband etc, can cope with the increased loads required by the proposed new developments.

Policy 7 – Transport and infrastructure

BMPC comment – With the decline of bus services, car use will become more essential. Off street car parking must be provided at higher levels than currently suggested. Parking bays and garages need to be wider to allow for the width of modern cars – the standard size does not seem to have changed for many decades. All connecting main roads, and particularly junctions, must be assessed for suitability for the increased traffic flows and layouts changed where necessary before developments take place. The present road network can hardly cope with current traffic levels during the rush hours. The additional traffic from all of the proposed developments will only make the situation worse.

5 – Providing for housing choices

Executive Summary 5 – Homes to suit all incomes

BMPC comment – There seems to be a general notion that accessible housing, i.e. all on one level with no steps for access, must be in individual units such as bungalows or blocks of flats solely for the elderly. There could be a case for making a 2 floor dwelling two units with an accessible unit on the ground floor and a similar but non accessible, possibly a starter unit above. This would allow people needing accessible accommodation to integrate better. With careful design (for soundproofing etc) this should be acceptable.

Areas of green space should be provided in all developments.

Policy 8 – Market and affordable housing mix

BMPC comment – There should be a good mix of types of housing within each development so that people wishing to downsize do not have to move away from their friends and connections.

Policy 9 – Provision of affordable housing

BMPC comment – none

Policy 10 – Housing in rural areas

BMPC comment – none

Policy 11 – Provision for the gypsy and traveller community

Station Court (by Knockholt Station) increase from 4 to 8 permanent pitches

BMPC comment – none

Policy 12 – Housing density

BMPC comment – The policy aims for a high average density. The capacity of all sites in Badgers Mount and Halstead are calculated at 40 DPH. The last paragraph of the policy states: *For all other proposals for housing development the density of the development should be at least equivalent to that in the surrounding area, with no unacceptable impact on local character.* The overall density of the built up area of Badgers Mount is about 8 DPH, and the highest density of recent developments (4 houses in Old London Road, but only within the site boundary, excluding the area of the road in front) is 27 DPH. Badgers Rise and Crest Close are 25 and 22 DPH respectively. The density of the more recent redevelopment of 4 houses replacing 2 in Highland Road just north of the Memorial Hall is 17 DPH. Badgers Mount and the nearby villages are rural areas, not town centre or urban areas where higher densities are common. Therefore we believe that 40 DPH for the sites proposed in this area is too high, and contrary to this policy, and should be reduced to an absolute maximum of 20 DPH to respect this policy and protect the character of the local area.

6 – Supporting a vibrant and balanced economy

Executive Summary 6 – Creating Local Jobs and Better Town Centres

BMPC comment – none

Policy 13 - Supporting a vibrant and balanced economy

BMPC comment – We support the mixed use sites which provide or retain employment. We are concerned that many of the sites proposed for housing are current employment sites, the loss of which will lead to more people travelling further to work thus adding to the already significant traffic problems in the whole area.

Policy 14 – Town and local centres

BMPC comment – none

7 – Ensuring new development respects local distinctiveness

Executive Summary 7 – Designing and protecting attractive places

BMPC comment – none

Policy 15 – Design principles

Includes reference to well designed streets inc. car parking.

BMPC comment – In all areas, and particularly more rural areas, public transport is declining so residents are more reliant on car use. More provision must be made for off street parking, taking account of the size of modern cars as the standard size for parking provision has not changed for many years. One parking space per bedroom should be the minimum for rural areas for all forms of accommodation including sheltered housing where residents will be receiving frequent visits from carers etc.

Policy 16 – Historic environment

BMPC comment – none

Policy 17 – Historic assets

BMPC comment – none

8 – Health and well being, air quality and climate change

Executive Summary 8 – Clean air, healthy living and preparing for a changing climate

BMPC comment – none

Policy 18 - Health and well being, air quality and climate change and flooding

BMPC comment – none

9 – Leisure and open spaces

Executive Summary 9 – Improving opportunities to relax and have fun

BMPC comment – Badgers Mount does not have any recreation space or allotments within the main developed area and the proposed redevelopment of the Chelsfield Depot could provide the opportunity to create such areas.

Policy 19 – Open space, sport and leisure

BMPC comment – There are other areas of woodland in Badgers Mount adjacent to the areas shown in Appendix 8 which are just as open and accessible but not identified, including Coneyarth Wood, Goss Bushes and Broomhatch northwest of the marked area of Saunders Spring Wood to the M25 spur road and between the A224 and Chelsfield Lane, and Jenkins Neck Wood between Badgers Road and Shacklands Road immediately to the west of the M25.

B APPENDIX 1 – SITES

a) Sites within Badgers Mount

HO 150 – Chelsfield Depot, Shacklands Road

BMPC comment – We support the redesignation of the site. It is accepted that a residential development would be an improvement compared to the present unsuitable, sometimes noisy industrial use. However, the proposed density of 40 DPH is unacceptably high compared to the less than 8 DPH for the present developed area of Badgers Mount and therefore contravenes policy 12. The density should be reduced to a maximum of 20 DPH.

There is no evidence that the infrastructure of utilities, roads etc can accommodate such a large development. The access indicated could be problematic being so close to the roundabout.

Integration with the existing community must also be addressed. The opportunity should also be taken to incorporate a recreation area and allotments available for the whole of Badgers Mount, possibly utilising the non ancient woodland part of the site.

HO 368 – Calcutta Club & Polhill Business Centre

BMPC comment – We support the redevelopment of the site but would stress the importance of retaining local employment. This site is in both the Green Belt and AONB, and if only residential would be a group of dwellings very remote from any existing development and a long way from any public transport. The density proposed is out of keeping with the nearby area, contrary to policy 12 and should be reduced to a maximum of 20 DPH. While some of the site may no longer be viable for employment, it would be desirable to keep some, possibly the hotel/diner, a facility which seems to be lacking in the area, and the small office. We are concerned about whether the infrastructure, utilities, roads etc. can accommodate such a large development, particularly with it having direct access onto the A224. Planners should ensure that if this site is developed it does not set a precedent for ribbon development all along London Road to the north.

b) Sites in Halstead

HO 307 – Oak Tree Farm

BMPC comment – We support redevelopment of this site as it would be an improvement compared with the present use, although it would be very close to the proposed crematorium immediately to the north. We are concerned about whether the infrastructure, utilities, roads etc. can accommodate such a large development, particularly with it having direct access onto the A224. This would be a group of dwellings very remote from any existing development, a long way from any public transport. The density proposed is out of keeping with the nearby area, contrary to policy 12 and should be reduced to a maximum of 20 DPH if it is included to be developed.

HO 328 – Land west of roundabout

BMPC comment – This site is actually in Halstead although listed as Badgers Mount. We support the proposal which would be an improvement from the existing overgrown area with an assortment of containers etc, but the density proposed is out of keeping with the nearby area, contrary to policy 12 and should be reduced to a maximum of 20 DPH. The site is about 10% larger than Crest Close which is almost opposite this site in Old London Road, Badgers Mount, and a similar shape. Crest Close has 9 dwellings which have small gardens and there would have been little scope for more, so we believe that 10 or 11 is the maximum number this site can accommodate. Careful design of access must be made as it is so close to the roundabout.

MX 24 – Fort Halstead

BMPC comment – We object strongly to the proposed increase in scale of the already approved redevelopment of the Fort Halstead site. When outline permission was given, it was considered that 450 dwellings was the maximum the site and its unadopted access road could accommodate. This has not changed. The original requirement that the redevelopment should be employment led must also be maintained. If the number of dwellings is increased, then the access onto Star Hill must be utilised as the higher number of cars using a single access onto Polhill would be unacceptable. Can the utilities (electricity, gas, water, drainage, communications etc) provide the necessary services? If the proposed increase in the number of dwellings is accepted, Fort Halstead will have a larger number than the existing village of Halstead.

MX 41 – Broke Hill Golf Course

BMPC comment – We object strongly to the proposed development. The NPPF says that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. This proposal isn’t just harmful, it is total destruction of the Green Belt. No “very special circumstances” have been submitted for this

site. The proposed loss of this area of Green Belt would give a direct link merging Halstead and Pratts Bottom, and before long Chelsfield, contrary to the Green Belt policy of preventing urban sprawl. Sevenoaks must protect its boundary Green Belt to prevent such sprawl joining Sevenoaks with Greater London. Halstead achieved one of the highest scores in the Arup Green Belt assessment report, January 2017, which will be destroyed if this development goes ahead.

With such a large development, can the utilities (electricity, gas, water, drainage, communications etc) provide the necessary services? Roads in the area are already heavily congested in rush hours and are not capable of accommodating the extra traffic which would be generated. While it is close to Knockholt station, rush hour trains are already crowded and there is apparently no capacity for additional trains or adding carriages to the existing trains. Bus services for people to get to and from work in nearby towns are non-existent following the withdrawal of the 402 service. Latest drawings for the proposed development suggest road access onto Stonehouse Lane, Cadlocks Hill and Station Road, all of which are unsuitable for the increased traffic.

The proposed sports facilities do not appear to provide anything for the local residents, only extra facilities for expansion of clubs with existing facilities in Sevenoaks town. It appears that the only people supporting the development of this site are members of Sevenoaks Rugby and Hockey Clubs who are really only interested in a small corner of it for the pitches they will be given, together with a substantial financial "gift", and they have little or no interest in the rest of the site.

The proposed number of houses for this site is greater than the existing village of Halstead. If this site and the enlarged Fort Halstead proposal are accepted, Halstead will have more than three times the number of dwellings as the current village. Such a massive increase is unacceptable and contrary to Policy 1 – A Balanced Strategy for Sustainable Growth in a Constrained District. So much growth in a small area cannot be sustainable.

There is a considerable amount of wildlife in and around the site which will be significantly affected by the proposed development.