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27th July 2020

Dear Ms Shearing

## Fort Halstead - Hybrid Planning Application 19/05000/HYB

Thank you for your letter dated 6 July 2020, the contents of which are noted.

I am writing to register my objection to the planning application above.

Whilst broadly supportive of the proposed development of the Fort Halstead site I helped coordinate a campaign, in the autumn of 2014, to make local residents aware of the proposed unrestricted use of the Star Hill access and highlight the safety concerns associated with Star Hill Road and rat running through the local villages.

I am extremely disappointed that the hybrid planning application is once again proposing the unrestricted use of the Star Hill access. Whilst mention is made of measures to encourage drivers to utilise the Polhill access, there is no evidence to back up this proposal with journey times to demonstrate that Knockholt, Pratts Bottom and Halstead won't be used as rat runs. Knockholt and Pratts Bottom are currently used as a rat run from the Morants Court Road roundabout to the A21.

The Technical Note, dated 26th November 2014, in the Transport Assessment, Appendix O describes Star Hill Road as "...a narrow road, unlit rural lane with a width of approximately 5.0 metres and has a steep gradient of up to 10%...". The Star Hill access is located on a bend just below the brow of the hill and presents a significant challenge, because of the poor visibility, when leaving the Fort Halstead site in either direction (as shown in Appendix O, Photo 3). Whilst I note that the 2015 junction improvement drawing has been included with the hybrid planning application, it is disappointing that a scheme that just exceeds the minimum requirement has been reused.

In addition, "Tapers on the junction corner radii to help large vehicles to turn without overrunning the centreline of the major carriageway" are being proposed on the Star Hill access and Transport Assessment, Appendix H includes swept path analysis for 16.5m articulated vehicles. It seems wholly inappropriate that 16.5m articulated vehicles should be encouraged to use Star Hill Road.

Nothing has changed in the last 6 years other than an increase in the number of cyclists that use Star Hill Road.

Clause 2.6.8 in the Technical assessment states "There are limited existing cycle facilities in the area. Since the site is located on top of a chalk escarpment, there is a steep hill to negotiate in order to access the site from Sevenoaks." Whilst the current Fort Halstead workforce may not access the site on their bikes via Star Hill it is used on a daily basis by recreational cyclists.

The Technical Note, dated 19<sup>th</sup> March 2019, in the Transport Assessment, Appendix O states "Based on a recent site visit there was no evidence of any use of this section of road by vulnerable road users i.e. pedestrians or cycles."

As a resident of Knockholt for over 25 years I can confirm that the weekly number of recreational cyclists using Star Hill Road, both individuals and from cycling clubs, is in 3 figures.

Finally, I would draw your attention to the minutes of the Pre-Application Meeting with KCC Highways Department, dated 27<sup>th</sup> June 2018, in Transport Assessment, Appendix A.

In Clause 2.4 the KCC representatives stated "DB added that KCC would object to a new HPA if only one access point is proposed as any site with more than 300 units needs more than one. KCC need to be consistent in terms of their requirements for access points across all sites. LR further added that adopted Kent Design Policy requires two access points for sites of this size and that it would be difficult to justify why this site should deviate from policy." This suggests it would not be impossible and the provision of a "sub standard" access (in my opinion) could be used as justification to deviate from policy.

Furthermore, in Clause 2.5 the PBA representative stated "RP stressed that whilst it is acknowledged it would be preferable to have two access points. However, the site can still function adequately from a capacity perspective with a main access onto A224 and with Star Hill as an emergency / bus / cycle / pedestrian access. Therefore development should not be prevented should two full access points not be consented. In the event of road works The Star Hill access could be used on a temporary basis to access the site."

It would seem as though the proposal to use the Star Hill access is being driven by KCC Highways Department's requirement to tick a box, in a design policy document, rather than to protect the road users on Star Hill and residents of Knockholt, Pratts Bottom and Halstead.

Yours sincerely

Simon Tanner

**Simon Tanner**