

By HAND

7 Armstrong Close  
Halstead  
TN14 7BS

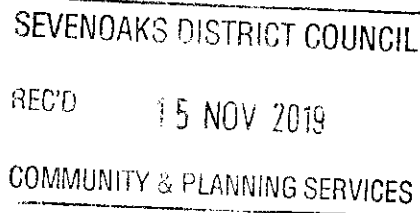
Sevenoaks District Council

Argile Rd

Sevenoaks

Planning

Ref 19/05000/HYB



I strongly object to the above application for the following reasons:

Strict conditions were implemented on the original development of 450 units on site 57. The site was to be employment led only. Employment on the site will be reduced further by the removal of a hotel in order to squeeze in an extra 300 units. The village green has been dramatically reduced and the proposed development extends beyond the original footprint.

Site 57 should remain an employment led site only. Unemployment is at its lowest since 1975, which SDC provides evidence of in the local plan whilst boasting the lowest unemployment in Kent. There is no evidence to suggest that employment sites are needed in the local area, which undermines requests for housing developments to facilitate employment.

At present there is no water infrastructure on the site, which has considerable impact on current residents. Requests have been made by water companies to SDC requiring them to carry out an impact study prior to any development. This request has not been completed prior to smaller developments within the area being approved, which should be granted alongside the Water Frame Directive Assessment.

The water quality within the site is so poor that residents are often

without drinking water due to unknown sources of contamination. Residents spent 37 weeks without drinking water in 2018 and 4 weeks during the spring and summer of 2019. Currently residents are without any water at all and when it does eventually get reconnected, will again be on boil notice whilst investigations take place as to whether or not it is safe to drink. There is still yet to be confirmation as to who will provide water for the new development and what impact a new development will bring to current over complicated system; which requires residents to flush through their properties are vacations of several weeks.

Despite requests, there has been a lack of information coming forward regarding the clearing of contamination from this site. The plan must provide evidence of how it will closely monitor the removal of heavily contaminated land on site 57, all situated in proposed residential areas. Many areas on the site are contaminated with depleted uranium, cyanide poison, photo chemicals, oils, acids, metal carbons, petrol chemicals, carbons, anthracite coal poisons among others. How will the contaminated soil be removed safely without contaminating the surrounding green infrastructure and the residential units adjacent to the site? Worryingly at a presentation earlier this year at the Fort, a disgraceful representative for the developer confirmed that the social housing would be situated on the contaminated land! Amongst the obvious, this portrays a complete lack of disregard to the health and well being of future residents, especially those who have the misfortune of finding themselves a little less better off than others. Is their health and well being less important than someone who can afford to buy a property?

The plan does not consider any action to develop a slip road at junction 5 of the M25, which would have an impact on the traffic or the land required to do so. There is little or no understanding of the full scale of the area being dealt with and the impact a new road or development will have on each other.

Although site 57 has brown field, it is of low level and density surrounded by thick ancient woodland situated in an AONB in an extremely high performing Greenbelt. How, when and why did SDC

find justifiable exceptional circumstances to remove this piece of land from the Green Belt, given that it is home to some of the 2% of ancient woodland remaining in the UK today; is one of only 14 AONB's in England and Wales, and is the 3rd strongest performing Green Belt from 101 land parcels situated in a low tier hierarchy?

In reference to proposed policy GB1 - Development in the Green Belt. In 2017, SDC commissioned ARUP to prepare a GB study of the Sevenoaks Area. Site 57 is situated in land parcel 76, which was ranked the third highest performing Green Belt in the district (101).

The site is situated in a highly sensitive Area of the GB and is in an AONB adjacent to the London Borough of Bromley. Fulfilling the top 3 Purposes of the Green Belt (5.6). The whole point of the ARUP report was to determine which areas of the Green Belt should demand the highest protection with limited developments. A high density settlement on this site regardless of brown field directly contravenes everything laid out within the report.

SDC have clearly ignored the findings of this report since they have omitted sites found within the top tier hierarchy, situated in poor performing Green Belts, but included sites found within the low tier hierarchy in the highest performing Green Belts.

In reference to policy LA1 Landscapes and AONB's. The National Parks and Access to the Countryside Act 1949 granted just 40 sites the status of AONB in England and Wales. The Kent Downs is one of the 40 AONB's and site 57 is located on the very peak of these downs. The NPPF states that AONB's be given the highest protection and that their settings will be given the highest protection in relation to landscape and scenic beauty.

SDC has already contravened their own policies by granting planning permission for 450 houses plus a business park on this site; and a further 300 compounds the issue.

It will effectively create another village in an Area of Outstanding

Natural Beauty, which will be larger than the adjacent existing settlements.

Site 57 contains a large area of Ancient Woodland, which is our richest land base for habitat and wildlife. Only 2% of the whole of the UK has ancient woodland. The referenced policy states that, "ancient woodland is an irreplaceable habitat" (6.6). The site is home to an array of wildlife including deer, badger, dormice and bats, which cannot be relocated. The NPPF (172) is clear that GREAT WEIGHT should be given to conserving and enhancing landscapes and scenic beauty and that the scale and extent of development within these designated areas should be limited". Any building above and beyond what is already on this site would conflict with the above policy.

The policy also states that ancient woodland and veteran trees will be protected and must be incorporated into proposals with suitable buffer areas to be put in place. To build an additional 300 houses upon this site will further contravene the policy and would decimate the biodiversity of the area, which cannot be replaced.

A development of this size would increase traffic movements by up to 4000 per day, which conflicts with the proposed T1 policy to mitigate any adverse travel impacts created by new development. The isolated position of the site does not allow for easy use of bicycles or walking for the average person. There is no public transport and vehicles will be essential for those who dwell there, further compounding one of the 14 established Air Quality Management Areas, where the M25 rises to meet the site, conflicting with policy HE1.

Paragraph 2.4 ST2 suggests that evidence points towards a requirement for smaller dwellings and based on the original application, the proposed 300 houses would not match the previous application in size by the inclusion of a greater percentage of 3/4 houses contravening policy ST2 by presenting over development. Halstead's Housing Needs Survey 2018, showed a need for 14 houses. SDC put this figure at 100. Even with this gross

over estimation, this site alone would hold 650% more house than required conflicting with policy H3, paragraphs 1&2 which states that "the local plan should follow the local need identified in an up to date rural housing needs survey. The proposed density of 60dph would not respect the local character of the area where density is just 15 dph resulting in gross overdevelopment.

Kind regards,



Lisa O'Donovan