

Little Orchard
5 Singles Cross Cottages
Blueberry Lane
Knockholt
Kent
TN14 7NH

Email: [REDACTED]

13th April 2021

Dear Claire Shearing

Re Planning Application:- 19/05000/HYB

Amended Consultation as detailed in the Consultation Letter.

I strongly **Object** to this amended consultation as if permitted, it would allow the applicant to manipulate any future development of the site to their advantage and the irreversible detriment of the Green Belt, AONB and quality of life of the surrounding villages.

I understand all of my previous comments will be taken into consideration, but the current 'amendments' represent major changes to what has been granted.

At the Inspector's Hearing into the Local Plan in autumn 2019, I was one of a limited number of people who applied and were selected to speak on behalf of their local residents on several specific items, one of which was the proposed development at Fort Halstead. The Inspector had previously studied the submitted proposed Local Plan and arrived at seven specific questions about the site which she considered required detailed consideration and responses:-

Q340 (b) ... whether there was 'evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

(c) ... was it 'deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

Q341. What are the exceptional circumstances for removing this site from the Green Belt?

Q342. Has full consideration been given to the impact of this development on the Green Belt?

Q343. Has full consideration been given to the impact of this development on the AONB?

Q344. Has full consideration been given to the impact of this development on local wildlife, biodiversity, ancient woodland, and existing local infrastructure, services and facilities, including GP surgeries and schools?

Q345. Would the increase of (300) dwellings on the allocated site represent an overdevelopment?

Q346. What evidence is there to support the anticipated completions on this site? 450 permitted units by 2031 (plus predicted completions for any additional numbers).

Despite the very tight time schedule for the sessions at the Hearing and the fact I was the last speaker in the morning, the Inspector allowed me to present all my objections in full, running well over time, and took copious notes, so obviously considered the facts to be of importance.

To summarise my responses:

SDC's own Site Allocation Tables (handed out in week 2 of the Inspector's Hearing) classify all settlements in the District according to 'Combined Population, Services, Green Belt and Employment Scores'. Our local settlements of Knockholt, Halstead and Badgers Mount were scored in the two lowest categories of 'Small Villages' and 'Hamlet'!

'Services' include Transport – the evidence is that rail, road, and public transport links are all woefully inadequate, with no prospect of significant upgrades.

In December 2018, SWECO carried out a Sevenoaks District Transport Assessment – Local Plan Evidence Base, on behalf of SDC. Some key points from this (Chapter 9 para 102) were that significant development 'be focussed on locations that are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.' They also highlighted that 'Within those villages that have a limited range of local facilities and transport options, there will be change on a more limited scale through

smaller scale housing developments consistent with the size and relative sustainability of the settlement concerned.'

They also stated that the Fort Halstead proposal at the edge of Knockholt would cause the village to be impacted by the increased traffic generated, specifically with reference to the proposed Star Hill Road junction and the Old London Road /Main Road junction at Knockholt Pound. This would be in addition to the pre-existing congestion in the village(s) at peak and school run times with consequences for air pollution which will only get worse with increased traffic. As a result, the previous permission was only granted with the Condition that the Star Hill access would be restricted to emergency and public service vehicles only, plus cyclists and pedestrians.

A consultation with Sevenoaks Rail Travellers Association advised that a recent Kent Route Study by Network Rail showed mainline trains are already: 'congested (60-100% of standing space used)' from Chelsfield onwards, but the study showed no significant improvement is planned between now and 2044. They stated 'peak hour services are already configured for the maximum 10 coaches so it would require an extra train ... (but) there's no capacity on the Tonbridge-Orpington line for an extra train path and no capacity at Charing Cross or Cannon Street to turn it round.'

The bus service has been cut so severely that villagers who previously relied on it have had to resort to private vehicles, some of the more senior even contemplating moving away as they feel trapped by the lack of transport options.

The promotion of cycling and walking with the associated benefits of less air pollution and increased health/fitness is laudable, but unfortunately in the current situation it is laughable, where the local hilly terrain attracts numerous cycling clubs because of its challenging nature – hardly conducive to school runs or shopping trips!

A further problem with road access exists at Polhill, where there is ongoing subsidence/slippage at the eastern side of the hill, monitored since 1998 following verge failure and carriageway instability, which will eventually require major remediation works as detailed in the Joint Transportation Board report in September 2006.

Green Belt and AONB issues are a serious concern, with visual intrusion, inevitable light pollution, and doubtless further permitted development, all in contravention of existing protection policies. For this reason there was a strong representation at the Hearing from the Campaign for the Protection of Rural England (CPRE) who stressed that if development is allowed there will be irreversible urbanisation of this area in the Kent AONB.

Q344. encompasses multiple serious issues regarding the environment – this is a rich biodiverse habitat and flora, fauna, and ancient woodland will inevitably be adversely affected. Many of the ancient trees have recently undergone ‘management’ works that do not seem justified if the ancient woodland were to be conserved as it should be, but seem to correlate with the prospect of it becoming almost ‘amenity land’ for any proposed development. The site is home to a wide variety of significant wildlife as was demonstrated at an illustrated talk given some years ago by an employee from the site who had documented and photographed over 40 species of butterflies and moths, many totally reliant on the rich flora/vegetation present on the site, but sadly no longer found in many other ‘managed’ habitats.

Other topics included local infrastructure and there are grave concerns about the existing services. Heating for the site relies on oil and a change to all electric for domestic, employment, and vehicle charging points will present enormous demands.

The current water supply is woefully inadequate, existing residents in Halstead relying on the Fort for their domestic supply have been forced to resort to bottled water for 38 weeks in the last two years!

Currently the local primary schools have capacity, but that would incur further congestion in the villages. A new school will only be required as and when new homes are occupied and meanwhile will incur yet more journeys from outside the area.

Local GP surgeries are already full and others would necessitate lengthy car journeys. The Princess Royal and Orpington hospitals are the nearest, but are already at capacity, with the only A/E Department oversubscribed. They are also in the London Borough of Bromley, with the possibility of incurring emission zone charges in the future, the alternative being longer journeys to hospitals much further to the south.

Q346. refers to completion dates, but this could be dependent on the very pertinent issue of contamination on the site as confirmed by the Waterman report, where significant contamination was found at 38 of the borehole sites. This was noted to be multi hazard in nature which would incur risk to construction workers, residents and visitors to the site. Remediation measures would need to be carried out and involve removal of materials from the site, with transport of the hazardous waste through the local lanes and roads. A timescale for this would be open-ended as it is highly likely further problems may be encountered, especially if deep piling is required to stabilise the sloping terrain.

It would be interesting to know the Inspector's conclusions on all the responses to her questions.

I reiterate my Objection and serious concerns that the current 'Outline' application would give any developer 'carte blanche' to substitute yet more housing for any 'alleged' redundant employment space, despite the fact that the original permission for 450 homes was conditional on the scheme being 'employment-led'.

I also refer you to SDC's own policy that any major development should be associated with the District's four principal settlements of Sevenoaks, Swanley, Edenbridge and Westerham.

Yours sincerely

Rita C Radford MB. BS. FRCS (Eng)