



Badgers Mount Residents' Association

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DELIVERED BY HAND

Planning Policy Team
Sevenoaks District Council
Argyle Road
Sevenoaks
Kent TN13 1HG

29th August 2018

Dear Sirs

**Ref: Sevenoaks District Draft Local Plan
Consultation July 2018**

The Badgers Mount Residents Association wish to formally record the following observations and comments relating to the various sections of the Draft Local Plan which specifically affect the residents of Badgers Mount. Obviously we cannot speak for every resident, but from our local discussions and communications, we believe we speak for the majority.

We have yet to see any reports that the Council has argued against the number of houses that the Government has stated must be provided in the Sevenoaks area. A figure of 13,960 properties is stated but, based on the Council's own figures on page 11 of the Plan which show an increase of 20,000 people between 2015 and 2035, we calculate that a requirement of between 6,000 and 10,000 houses would be sufficient for this. By just accepting what the Government has said, SDC is being forced to rely on making full use of the disgraceful 'Exceptional Circumstances' planning loophole. On Page 9 of the Plan, Cllr Piper, Portfolio Holder for Planning, states "*....so we have no choice*" We firmly believe the Council does have a choice. We often hear your boast that the Council is 'financially self sufficient' and receives no funding from Government. If this is true then you should be strong enough to fight for what is right for Sevenoaks, to be able to make your own decisions, decide your own Housing Plan and not be told what to do by a non contributing Government Department which has no knowledge of our area and no idea of what the impact will be of the arbitrary figure they are proposing.

We appreciate that the Plan is a draft and that its arrival has been publicised for some time; however, we are of the opinion that the actual publication date of the Plan and the rather short public consultation period during the summer holiday period is not in the best interests of the residents as so many people are on holiday; indeed some people have suggested that this was a deliberate ploy on your part. The Plan is a very large and extremely important document affecting the future of all who live in, work in and visit the Sevenoaks area and we would respectfully request that the Council extends the consultation period to fully allow your residents and Council Tax payers to absorb the magnitude of your proposals and respond accordingly.

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Within a two miles radius of our hamlet your Plan proposes the possible construction of almost 2200 new houses - 200 more than for the whole of the southern section of Sevenoaks.

In section 6.24 of the Plan you state that you seek to retain local services and facilities in "appropriate" locations to maintain the sustainability of our towns, villages and neighbourhood centres. You do not specify what qualifies to be an "appropriate" location. Having lost its Post Office, shop, garage, and café as well as a meaningful bus service, with the exception of a garden centre and a chain restaurant, Badgers Mount now has no services or facilities whatsoever and we can see nothing in your Plan that will change this. Therefore your statement that you seek to retain local services and facilities is absolutely meaningless for Badgers Mount and, even worse, your proposals in sheer numbers alone will completely change the face of an area which is within an Area of Outstanding Natural Beauty as well as the Green Belt which it is your duty, as our local Council, to protect.

Having read the Plan, we can see absolutely no solid proposals to make any infrastructure improvements, only vague suggestions for the possible provision of doctors' surgeries and shops, with no mention at all of any additional bus services, etc, to cater for these additional 2,200 houses, let alone any road safety improvements or additional/improved pavements. It is of paramount importance that The Local Plan includes an explicit statement/requirement that any development proposals put forward must include very specific infrastructure and services schemes, and that payments of any kind will not and cannot be made in substitution of these requirements.

The existing roads in our neighbourhood are already exceptionally congested. One only has to travel to and from Orpington or Bromley via Old London Road, the A224 and the A21 to know that the existing volume of traffic is very slow moving, and at peak times it is just one long queue from Hewitts Roundabout all the way to Bromley, and all this is before the new burial ground in Old London Road and the proposed crematorium in London Road, begin to operate. To include development sites which will make these roads become even more congested by increasing the number of vehicle movements is beyond belief and please don't insult us by suggesting that people will use the trains from Knockholt Station. Any present day commuter will tell you that the trains can't cope with the current number of residents, let alone with the extra passengers resulting from an additional 2,200 houses, nor will people suddenly start walking and cycling everywhere - especially on our local roads which are just too dangerous.

The area would become just one large traffic jam and the extra exhaust/air pollution caused would be a greater health hazard to everyone than at present, even more so given the latest Study released yesterday on the effects of air pollution on cognitive performance. On page 96, item 8.6, the Local Plan states "Road traffic is the main contributor to poor air quality". We estimate your local proposals alone could generate an additional regularly used 3000 private cars, plus all the additional commercial vehicles servicing the houses, and this is without the Chief Executive of Quinn Estates, owners of the Broke Hill Golf Club site, stating in this week's Sevenoaks Chronicle that they want to open up their proposed sports facilities to "tens of thousands" of people!

Extensive traffic surveys and air pollution assessments must be carried out and published by the Council BEFORE ANY of the local sites currently being considered are included in the final Local Plan.

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With regard to the Green Belt, you have stated in the 'Executive Summary' that "..... we will be building on Green Belt land only in "Exceptional Circumstances" where developers are proposing social and community benefits for existing communities."

We consider this statement smacks of a thoroughly unscrupulous inducement, particularly in respect of the inclusion of the 60.2 Ha site at Broke Hill Golf Course, Halstead where it's difficult to find the inclusion of any social and community benefits for existing communities. In addition to this, the much publicised "deal" between the Quinn Estates, owners of the Broke Hill Golf Club site, and Sevenoaks Rugby Club and Sevenoaks Hockey Club where these Clubs will be given money by Quinn Estates in return for their members' support of the proposals, is nothing other than bribery and is absolutely outrageous, even more so as these Clubs cannot be considered as an "existing community" in this area, and their members won't be the ones who have to suffer the consequences of the development. There can be NO "Exceptional Circumstances" in respect of the Broke Hill Golf Club land. The site is bounded by the London Borough of Bromley to its north and west and must be regarded as sacrosanct Green Belt as it provides the all important buffer between us and the urban sprawl of London. If you allow this proposal, you might as well abandon the Green Belt altogether and simply develop the land all the way to the M25.

On pages 44 and 45 of your Draft Plan you clearly set out the parameters of 'Protecting, Conserving and Enhancing Green Belt, Landscape and the Natural Environment'. These pages alone challenge your inclusion of the Broke Hill Golf Club site. As previously stated, the published proposal for this land does not provide any social and community benefits for the existing surrounding communities, in fact the exact opposite is the case. The proposal is for a new self contained "*garden village*" but we can see absolutely no evidence of the proposal addressing the existing local infrastructure deficiencies let alone the additional ones which will arise, nor does it address any of the detrimental affects it will have on the local environment, air pollution, etc.

The Council appears to be relying on site developers to provide infrastructure and social housing, or doing away with this requirement by allowing the developers to pay a sum of money into the Council's pot as an alternative. We consider this second option to be morally very wrong, even if it is allowed within planning law. The 'Medical Facility' at the Dunton Green Cold Store development is a classic example of failure; the medical facility was never provided and because of a planning 'get out' clause, the developer paid money to the NHS and by doing so this allowed more residential units will be built in its place. Who's to say that even if medical centres are proposed at the Broke Hill Golf Club site and the other large development sites being put forward, that the same thing wouldn't happen again, thus adding yet more patients to the existing and already overloaded local GP lists.

In addition, the proposed small commercial elements in the Broke Hill plans could, by default, be turned into even more houses after one year. Page 74 of your plan opens the door for this.

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Other considerations that do not appear to have been considered in the Plan are:

1. The need for water, electricity, gas and drainage services for the proposed new developments at Broke Hill Golf Club, Fort Halstead, etc. Has the Council considered this aspect of the proposals or consulted with the Public Utility companies to see if they can cope with these extra requirements?
2. What additional Health facilities will be provided in the District? The NHS Hospitals are currently struggling to cope with existing demand and most local GP surgeries are full. The suggestion of developing the existing Sevenoaks Hospital site into houses and providing small medical 'hubs' around the area, doesn't take into account the existing shortage of medical staff, of people having to travel further for Xrays, scans, etc, Where will staff be found to man the new 'hubs'?
3. What additional school facilities will be provided in the District? To include an infants/primary school is not enough. Any parent will tell you how difficult it is to find secondary school places for their children.
4. Kent County Council has recently been a party to the reduction of what was an already poor bus services in our area. What we have now leaves much to be desired. In addition to this, the trains currently running from Knockholt Station in the rush hours are already full. Have the train companies the capacity to increase train numbers and size to cope with the extra passengers, and/or have they even been asked?
5. Has the Council considered the on-costs of the highway maintenance, servicing and cleaning that would be required for the considerable additional roads that would be generated by the Broke Hill Golf Club proposal and other, similar developments? We are told that Council spending on public services is already at breaking point and we doubt that the extra Council Tax income generated by these houses will be enough to provide all the services needed. Furthermore, will funding be made available for all the additional Police, Fire and Ambulance services that will be required?

In the draft Local Plan, the Badgers Mount and Halstead parishes alone are disproportionately bearing the brunt of the proposed housing developments - 14% MORE than the WHOLE of the southern side. There is, justifiably, a general feeling locally that we are to be turned into one large building site and traffic jam and that the Council doesn't care.

Indeed, of your Exceptional Circumstances sites, just under 72% are in the northern part of Sevenoaks, and when the sites at Dunton Green, Chevening and the Sevenoaks Quarry are included, this figure rises to around 85%. Compare this with the 2000 proposed properties in the WHOLE of the southern area, ie just under 15% of SDC's proposed figure of 13,960, and it raises the question of what it is that the Council has against our area that they would propose such a grossly disproportionate Plan, ie 11,960 properties in the northern area and only 2000 in the southern area. It should be remembered that it is the residents' taxes of the whole of the Sevenoaks district which pay SDC's wages bill, and that it is the duty and role of all Council employees and Councillors to look after the best interests of ALL their residents on an equal basis.

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To even consider, let alone include, housing developments of such magnitude in one area, especially an Area of Outstanding Natural Beauty and Green Belt, will totally destroy the rural and green environment which it is SDC's duty to protect. The current overall housing density of the accepted measured developed area of Badgers Mount equates to a figure close to a 10 DPH, ie just under a quarter of the 40 DPH that your draft Plan is proposing. A recent brownfield housing development in Badgers Mount approved by SDC, equated to more than double our existing density, 27 DPH to be exact, and whilst the properties are of a good design, they are exceedingly cramped. Therefore, to suggest an even greater local density of 40 DPH would be planning vandalism.

We do not believe the Council has fully investigated the possible brownfield sites in the whole Sevenoaks district. This must be carried out and all possibilities exhausted before any Green Belt development is even considered. It appears that the Council has prepared the Local Plan solely on the responses they received to their recent 'invitation for sites', the replies to which are based purely on the profits to be made by the owners and not what is best for communities. We look to all of our elected District Councillors to fulfill their duties to its existing residents, to support and protect our environment, and particularly to uphold the principals of law. For an AONB and the Green Belt to be considered sacrificial by these same Councillors could be considered an anarchism.

Finally, as previously stated, we are aware of certain financial arrangements being entered into by interested parties attempting to buy support for allowing Green Belt developments. We consider these arrangements to be nothing short of bribery and grossly immoral, if not illegal. We therefore trust that all Council employees and District Councillors who have had any connection/contact whatsoever with any interested party. companies or organisations relating to the Local Plan, have recorded all the meetings, hospitality and discussions that have taken place. All this information should be made public and, if any misdemeanors are evident, the people involved should be totally excluded from the preparation/approval of the Local Plan.

We respectfully request Sevenoaks District Council to fully consider the magnitude of the disproportional detrimental affect the proposed Draft Plan will inflict on our small hamlet and adjoining villages. Furthermore please DO NOT give permission for the Green Belt to be destroyed. There are other options still available.

Yours faithfully

Badgers Mount Residents' Association

Copies by Email to:
Rt. Hon. James Brokenshire MP
Sir Michael Fallon MP
Badgers Mount Parish Council
Halstead Parish Council
Halstead Green Belt Futures Group
Cllr. John.Grint
Cllr. Garry Williamson
Cllr. Nick Chard
Cllr. Peter Flemming, SDC Leader
Cllr.Robert Piper
Richard Morris SDC Head of Planning