

Supplementary ADMP Sites Consultation March – May 2012

Site Name	No of Comments	Individual / Organisation	Representation	SDC Response
<u>Bovis Manor House, New Ash Green</u>	32	Ash-cum - Ridley Parish Council	Changing to residential will be detrimental to New Ash Green and further move it to become a dormitory for the surrounding area with even less flexibility for future needs, as yet unknown. The approx. density of 50 dwellings per hectare is too dense in view of the need to establish an appropriate setting for the Manor House, a listed building.	Noted re loss of employment space, but site not allocated for employment and updated employment forecasts (2011) indicate additional B1 (office) space not required in the District. Not a highly accessible location. Density reduced to 30 dph to reflect density of surrounding area and site constraints
		Kent Highways KCC	In principle this site could accommodate a residential development proposal, Will require would be the need for widening of the existing access corridor and some associated clearance of visibility splays. Lack of public pedestrian provision across the site frontage - would need a link to adjacent footways east and west of the site. Need to improve direct pedestrian links to bus stops with a further need to improve pedestrian facilities/crossing points at the junction of North Ash Road and Ash Road immediately west of the site What type of housing/facility is proposed as described as being suitable for older people and people with special needs.	Highways comments noted and will need to be incorporated into any planning application on the site Site could accommodate a range of housing types, including housing designed for older people –determined through planning application process

			The site contains a 19th century grade II listed building. There is general archaeological potential for prehistoric and Romano-British finds based on archaeological discoveries c. 270m south of the site	Noted
		Moat Housing Group	Fully supports a residential development that would support the requisite amount of affordable units. It is well placed and served locally and is where residents would choose to live	Noted and support welcomed
		Bovis Homes Ltd – site owner	Fully supports and endorses the conclusions and recommendations	Noted
		Kent Wildlife Trust	Mitigation and or compensation for any increased pressure on the ancient woodland complex should be considered within the policy formulation for this site. This could be in the form of increased management for the woodland complex or alternative natural habitat to link the woodlands within the locality.	Noted – TPOs now identified on site plan. Any planning application on the site would need to identify any ecological impacts and propose commensurate mitigation.
		Environment Agency	Data indicates that part of the proposed residential site may lie in an area that is susceptible to surface water flooding	Noted
		District Councillors - Ash and New Ash Green Ward and County Councillor	Importance of retention of employment opportunities. No need for additional residential. Planned community that has already exceeded its size (development is complete)	Noted re loss of employment space, but site not allocated for employment and updated employment forecasts (2011) indicate additional B1 (office) space not required in the District. Not a highly accessible location.
			Bovis have no financial interest in the	Noted. SDC working with neighbourhood

			<p>centre and therefore cannot guarantee re-provision.</p> <p>Limited residential may be acceptable if no alternative employment use can be found, subject to conditions related to design, protection of listed building and trees, car-parking, access and inclusion within village covenant</p>	<p>plan working group and landowners to bring forward regeneration of village centre</p> <p>Density reduced to 30 dph to reflect density of surrounding area and site constraints. Allocation notes importance of design, listed building and setting, trees, parking and village covenant</p>
		<p>Local Residents Comments, including:</p> <p>Knights Croft Residents Society</p> <p>New Ash Green Village Association Limited</p> <p>Over Minnis Resident's Society</p> <p>Punch Croft Residents Society</p> <p>Friends of the New Ash Green Centre</p> <p>Alison Smith</p>	<p>Extra traffic, noise and pollution Must provide sufficient on-site car-parking provision - must not include any parking areas belonging to Knights Croft, Punch Croft, Over Minnis or The Shopping Centre Needs considerable road widening alongside safer pedestrian crossings and routes to the centre Loss of privacy Development must respect the surrounding neighbourhoods</p> <p>Density too high Harmful effect on the unique residential and visual amenity of New Ash Green. Result in over use of local services/ amenities i.e. primary school and doctor's surgery</p> <p>No mention of the possibility of affordable housing Give consideration to provision of housing for older people and those with special needs</p>	<p>Noted – comments have been sought from Kent Highways Services and recommendations will need to be incorporated into any planning application on the site. Provision of on-site parking referenced in allocation. Site layout to be designed in such a way that does not impact on the amenity/privacy of existing residents. Tree screen to be retained.</p> <p>Density reduced to 30 dph to reflect density of surrounding area and site constraints. Any planning applications on the site will need to address any infrastructure impacts via mitigation / financial contributions</p> <p>Affordable housing will need to be provided in line with Core Strategy policy SP3 (40% provision). Site may be suitable for housing for older people. Site owner is promoting site for residential</p>

		<p>Andy Taylor Chris & Frances Carter Claire Pearsall David & Maggie Wilkinson B Yaxley Bruce Glen Calow J Clifton-Gould JP Bell Edward & Thea Prentice Keith & Loulette McDowall Ladybird Studios Mr K Bolton Stuart Richardson T/A Pizzalands</p>	<p>Viability is questionable</p> <p>Loss of local employment - the provision of new employment uses New Ash Green Village Centre seems unattainable. Bovis Homes has no power to deliver this.</p> <p>Links to the existing footpath network Retain and preserve the Manor House and its setting Provide for an agreement between the developer and the Village Association to include the property in the Village Management Scheme</p>	<p>development.</p> <p>Noted. SDC working with neighbourhood plan working group and landowners to bring forward regeneration of village centre.</p> <p>Allocation notes importance of listed building and setting, linkages and village covenant</p>
<u>Currant Hill Allotments, Westerham</u>	16	Westerham Town Council – site owner	<p>Confirm that as community land we could not and would not progress any change of use without consulting our community. The time table to achieve this after consultation is likely to run more realistically into the Plan's long term phasing. Have had to move somewhat faster in our preparation for this due to the proposed change of use of the KCC land and consequent preservation of a future vehicular access to the allotment site</p>	<p>Noted. Amendments made in relation to phasing, and reference to further community consultation. Cartographical amendments in relation to access notation</p>

		Sport England	Object to the allocation of the land adjacent to Currant Hill Allotments, Westerham (Former Safeguarded Land) as a replacement allotment site	<p>Noted. Letter sent to Sport England 22 May setting out why the land to the north of the allotments is not considered to fall under the definition of a playing pitch or playing field.</p> <p>The Council has been working with Westerham Town Council (who own the site) to identify suitable replacement allotment land and a number of options were proposed. The Council is committed to the view that replacement allotments need to be of equivalent or greater value, in terms of their size, location, accessibility and quality, in order to maintain the supply of allotments for the local community. The most suitable site for the replacement allotments is considered to be an extension of the existing allotments into the field immediately to the north of the allotment site, which is currently leased to Churchill School, on a short-term, one year rolling lease. The school is aware of this proposal and has confirmed that it can accommodate the loss of the field without prejudicing its activities. The field is rarely used and is not laid out or delineated as playing pitches. The school uses fields to the north and west of their buildings for their playing fields, and the field to the north is delineated as playing pitches.</p> <p>The proposal is therefore to re-allocate the lower southern portion of the</p>
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				allotment site for a small residential development and to re-provide equivalent allotments on the land to the north of the existing site. The land to the north of the allotments is not considered to fall under the definition of a playing pitch or playing field.
		Environment Agency	Flood modelling and historic records indicate that the roads immediately south and east (South Bank and London Road) of the site may be affected by flooding which could impact on access/egress to the site	Noted – to be considered at detailed planning application stage.
		KCC Kent Highways	Churchill Primary School is in close proximity to this site. The development will need to be mindful of the presence of the school and to avoid impacting on their daily routines. This site is on the edge of a medieval town. Low level archaeology is anticipated Access onto London Road north of Rosslare Close - width and visibility appear to exist to allow a suitable access to be created at this location onto London Road. Rysted Lane as pedestrian access	Noted – to be considered at detailed planning application stage. As set out in allocation, main vehicular access to site to be via adjacent site and London Road. Rysted Lane to serve only as pedestrian/cycle access.
		Kent Wildlife Trust	Site biodiversity surveys will be sought to ensure any biodiversity concerns are adequately mitigated and biodiversity enhancement will be required on the adjacent replacement allotment site and within the development in the form and linked Green Infrastructure	Noted – to be considered at detailed planning application stage. Biodiversity surveys referenced in allocation

		Moat Housing Group	Support if the allotment could be moved	Noted
		Natural England	Site surveys must be completed, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by any proposed development, is established before the planning permission is granted	Noted – to be considered at detailed planning application stage. Biodiversity surveys referenced in allocation
		Cooper Estates Ltd	<p>We find that there are fundamental policy principle and site constraint matters which are either in conflict with existing adopted CS and Government planning policy and/or there is substantial and significant uncertainty. It is not clear that the replacement allotment use can be delivered or is appropriate for the intended use; it is thus an unsound basis on which to proceed to confirm a residential allocation for the land in question.</p> <p>The NPPF states that plan allocations should be “realistic” (Para.154) and deliverable (paragraph 182).The proposed residential allocation of this site including the aim of providing elderly persons or special needs housing is neither realistic nor deliverable given the absence of any credible policy basis and the other constraints referred to above.</p> <p>The proposed allocation should be deleted.</p>	<p>Comments noted. Objection is related to the notation on the site that it may be suitable for housing for older people, which is considered appropriate, given the site’s location in close proximity to a range of services.</p> <p>The Town Council own the potential replacement allotment land and have agreement from the school for this proposal. Reference in allocation to seek permission in relation to the Allotments Act and reference added in relation to further community consultation.</p>

		Local Residents Brigitte & Geoff Tidy C Davies Mr & Mrs Everest Mr Don Pickett James Calvocoressi Jeremy Wilson/Kristine Mitchell Jo Connah Ms Clare Moran and William Hayes	Concerned with the site access - would it mean a new roundabout as the road is already fairly busy and this will just add to the congestion? Access road is very narrow and is the main access road to the Churchill Primary School. Already concerns about vehicle activity and dangers to young children attending the school Additional vehicle activity with new properties Loss relocation of the allotments / biodiversity / impact on wildlife	Allocation confirms access is to be via London Road (not Rysted Lane). Kent Highways Services have confirmed that width and visibility appear to exist to allow a suitable access to be created onto London Road. Any scheme would need to re-provide allotments of equivalent value, as set out in the allocation
<u>Station Approach, Edenbridge</u>	21	Edenbridge Town Council	Edenbridge Town Council - Support	Support noted
		Environment Agency	Data indicates that part of the proposed residential site may lie in an area that is susceptible to surface water flooding	Noted – to be considered at detailed planning application stage.
		Southern Water	Have not identified any current capacity constraints for the Station Approach site, however, it is not possible to reserve or guarantee future availability of this capacity. Capacity is allocated on a first come first served basis	Noted
		KCC Kent Highways	This site is fringed by a Roman road with potential for contemporary	Noted – to be considered at detailed planning application stage.

			<p>roadside features to be present. Gasworks and brickworks sites may be of industrial interest. Low level archaeology is anticipated</p> <p>The northern part of the site is likely to be more suited to B1 (Business) than B8 (Storage and distribution) as Station Approach is not really suitable for intensive use by large HGVs. Station Approach is constrained by parked cars lining both sides of the road, leaving just a 3m-wide lane between them. Access to and from Station Approach can sometimes also be limited by traffic queues in the High Street.</p> <p>Residential areas would be best accessed off Greenfield. It should be noted that some safety enhancements such as signing and lining are likely to be required at the junction of Greenfield and Forge Croft. It should also be noted that there appears to be a significant level difference between the site and Greenfield. An alternative access could be off Forge Croft by the substation</p>	<p>Highways comments noted and to be reflected in any planning application for the site.</p> <p>Noted re access to residential area. Land at Forge Croft by the sub-station is protected open space (EN9) and therefore not suitable for access.</p>
		Kent Wildlife Trust	<p>Recommend that a buffer of natural habitat such as rough grassland be incorporated into the design of the development adjacent to the railway corridor to safeguard this important corridor and the species which use it</p>	<p>Noted – buffer referenced in allocation</p>
		Network Rail –	<p>Considers that the existing</p>	<p>Noted. The allocation provides</p>

		<p>site owner</p>	<p>employment provision could be retained on the site without restricting housing to only half of the site and believes that given the site has a number of other constraints that the policy does not look to dictate the exact ratio split of the site for the different uses. This reference should therefore be removed from the relevant site plan</p> <p>It is accepted that the goods shed is in relatively good condition. However, as no conservation/heritage assessment has been carried out, it should not be a specific condition of development that it is retained. This matter can be addressed through the development management process to allow for full consideration to be given as to whether the structure is worthy of retention. Without any evidence that this building has significant value (which would require its retention), this reference cannot be included within a local plan policy</p> <p>Due to the requirement to include landscaping buffers along the site boundary, the site specific constraints such as the significant change in levels and the current economic climate, there are concerns that the proposed site designation could result in any proposed development being unviable and not deliverable</p> <p>Whilst Network Rail supports the on going regeneration of Edenbridge</p>	<p>development guidance, but the detailed split of the site can be determined through the planning application process. Core Strategy policy SP8 sets out that the employment capacity, represented by the commercial floorspace, would need to be maintained.</p> <p>Goods shed considered to be of significant historic interest and further investigation being undertaken to support the retention of this building</p> <p>Noted. Landscaping and access considered normal development costs. Viability (including in relation to provision of affordable housing) can be further discussed at planning application stage.</p> <p>Noted. Core Strategy Policy SP8 sets out that redevelopment of employment sites</p>
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			Town, if this site is to be used more efficiently it is requested that the policy includes some degree of flexibility that could allow residential development of the full site, if it can be demonstrated that a mixed use development is not financially viable	for purely residential can be considered if it is demonstrated that there is no reasonable prospect of their take-up in the plan period (to 2026) which provides the flexibility as requested.
		Moat Housing Group	Perfect for an affordable housing development in size, location and nature	Noted. Affordable housing will be sought in line with Core Strategy policy SP3
		Cooper Estates Ltd	The Council has allocated land at Edenbridge under Policy LO6 of the Core Strategy to provide appropriately for the development needs of the town. It is considered that a more appropriate approach for the site allocations document to take would be to bring forward planned development on that land rather than seeking to squeeze some residential development onto a site of this nature for the reasons highlighted above. The residential element of the site allocation should be deleted	Comments noted. Objection is related to the notation on the site that it may be suitable for housing for older people, which is considered appropriate, given the site's location in close proximity to a range of services. Site considered suitable for mixed use development
		Local Residents A and J Varley Alan Wingrove Ben Brownless	Vehicular access via Greenfield would cause additional traffic congestion in the High Street, Croft Lane, Forge Croft and Greenfield and make emergency access even more difficult. The current access is at a considerably lower level than the properties in Greenfield, thereby	Concerns related to access, traffic and parking noted and would need to be addressed in any planning application for the site.

		<p>Michael Bedling</p> <p>Howard Johnson</p> <p>I.G Falkner</p> <p>James and Valerie Mitchell</p> <p>Peter Dix</p> <p>Scott Gasson</p> <p>Stephen Smith</p> <p>J O'Neill</p> <p>Lesley Chapman</p> <p>Tom Burton</p>	<p>causing minimal disturbance to adjacent residential areas</p> <p>Access from Greenfield would be impracticable due to the steep embankment without creating a tortuous zigzag service road</p> <p>Vehicular access should be restricted to via Station Approach</p> <p>Additional on-road parking in Greenfield will make this quiet residential no-through road a more dangerous place for the elderly residents and the children</p> <p>Any development must have ample amount of parking</p> <p>It would increase traffic and noise, and would allow vehicles to travel faster</p> <p>The loss of vegetation barrier and mature trees and the wildlife-rich strip of land The triangular grass area should be retained and could provide pedestrian access straight onto Greenfield to make access easier for the town centre and school</p> <p>Almost all of the site is used either for storage, office accommodation or vehicle movement areas. Only at the south end of the site is there any space</p> <p>Value of properties would decrease, would seek to be compensated</p> <p>Single Storey/Bungalow style only</p>	<p>Noted. Vegetation buffer / screening required to be retained and augmented</p> <p>Noted. Site considered to be able be used more efficiently as a mixed use development site</p> <p>Not an issue considered by planning</p> <p>Design comments noted.</p>
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			<p>acceptable. Thus more suitable to those residents quoted "Older people and those with special needs" Housing in close proximity to a station and track is inappropriate for the elderly and vulnerable. This residential development seems a good use of the land</p> <p>Concerned that this proposal could affect the future ability to extend the platform at Edenbridge Town station which is urgently needed</p> <p>Should remain as an employment site with all access via Station Approach and/or Grange Close to keep the traffic away from the High Street and populated areas of Croft Lane, Forge Croft and Greenfield</p> <p>Environmentally beneficial possibilities such as PV generation, solar thermal, rainwater harvesting, self-contained sewage systems, eco friendly houses etc. Could be an opportunity to only permit an eco friendly development</p> <p>Will put additional strains on over-stretched infrastructure</p>	<p>Buildings can be designed / orientated so that railway line does not impact on residential amenity. Secure boundary would be required.</p> <p>Support noted</p> <p>Noted. This proposal is being proposed by the landowner Network Rail, who has not raised this as a constraint</p> <p>Noted</p> <p>Noted. Eco-developments are encouraged under core strategy policy SP2 (Sustainable development) which requires new homes to be Code Level 3 now and Code Level 4 from 2013.</p> <p>Noted. Any impacts on infrastructure will be mitigated via the imposition of a legal agreement requiring infrastructure / contributions</p>
<u>Leigh's Builders Yard.</u>	10	Edenbridge Town Council	Support the proposed changes that Leigh's Builders Yard should become	Noted and support welcomed. This site now has outline planning permission for

<u>Edenbridge</u>			residential rather than employment	a residential development and veterinary surgery, and therefore does not need to be included in the ADMP document
		Environment Agency	The site will be located on a 'dry island' and therefore roads in Edenbridge affected by flooding could impact on access/egress to the site. Some site investigation works may be necessary owing to previous commercial uses. However it is expected the risks to controlled waters will be low owing to the non-aquifer status of the underlying geology	Noted – this site now has outline planning permission for a residential development and veterinary surgery, and therefore does not need to be included in the ADMP document
		KCC Kent Highways	This site is fringed by a Roman road with potential for contemporary roadside features to be present. Gasworks and brickworks sites may be of industrial interest. Low level archaeology is anticipated. This site appears to be suitable for housing from a highways perspective	Noted – this site now has outline planning permission for a residential development and veterinary surgery, and therefore does not need to be included in the ADMP document
		Kent Wildlife Trust	No objections to residential development within this site, providing any recreational pressure on the River Eden LWS is mitigated	Noted – this site now has outline planning permission for a residential development and veterinary surgery
		Moat Housing Group	Perfect for an affordable housing development in size, location and nature	Noted – this site now has outline planning permission for a residential development and veterinary surgery
		Southern Water	A site specific policy should include the following: The development must provide a connection to the sewerage system at the nearest point of adequate capacity	Noted – this site now has outline planning permission for a residential development and veterinary surgery
		The Leigh Family – site	Fully support the allocation for residential development	Noted and support welcomed. This site now has outline planning permission for

		owner		a residential development and veterinary surgery, and therefore does not need to be included in the ADMP document
		Cooper Estates Ltd	NPPF states that plan allocations should be “realistic” (Para.154) and deliverable (Para 182). The proposed allocation of this site with an aim of providing elderly persons or special needs housing is neither realistic nor deliverable given the extant permission and the other constraints	Noted – this site now has outline planning permission for a residential development and veterinary surgery, and therefore does not need to be included in the ADMP document
		Local Residents David Parker Lawrence Neil Barry	The north western boundary of the site should be limited to single storey to obviate overlooking and shadowing Foul and surface water drainage must be discharged via the site access on to Mill Hill.	Noted – this site now has outline planning permission for a residential development and veterinary surgery, and therefore does not need to be included in the ADMP document
<u>GSK, Powder Mills, Leigh</u>	19	Leigh Parish Council	Much more investigation and consultation is required on the future of this site before it can be decided which option is preferable. Do not feel that they have had sufficient opportunity to prepare a detailed response and that SDC has been far too hasty in preparing its recommendations. Propose a period of three months to form a working party, to consult with the residents of the area and to consider all the reports SDC has commissioned to date and those we hope you now agree to commission Suggests a second independent report is commissioned to consider the	The Parish Council and local residents objected to the original proposal and SDC has supported a working group of local representatives to explore modifications to the allocation. The allocation has been revised to refer to additional marketing of the site for employment purposes and includes a recommendation that any residential development should be low density and generally not more than two storeys in height. It also states that the woodland areas surrounding the site should be protected and enhanced, via a management strategy, with appropriate levels of public access, and that open space and green buffer zones should be

		<p>potential re-use of the site in employment use, considering the need for an employment site in the next two to five years. The decision to change the use of this site forever based on one report is not acceptable</p> <p>A housing development would have a catastrophic effect on the infrastructure: roads, utilities and local schools</p> <p>The 'localised widening to enable free-flowing, two-way traffic' this may not be feasible and would have a large impact on the narrow country road and surrounding Green Belt land. Also recommends the possible adoption of the currently private western access road to the site, which could provide a direct route from Hildenborough to Leigh, avoiding the narrow and tortuous route past The Plough. This would create a much increased level of traffic along the narrow access road to Powdermills, is covered by flood zone 3.</p> <p>Recommends that a sustainability report is commissioned to consider how any development on the site would impact the highway network, schools and utilities. The site is classified as a major developed site but it is not a sustainable location. The Parish Council appreciates that the site is remote and has limited access, therefore it is essential that a sustainability report is prepared, as</p>	<p>incorporated into the development site. The stakeholder working group has accepted these proposed amendments.</p> <p>SDC is not proposing to commission a second independent report on the re-use of the site in employment use. The URS report (commissioned by SDC) looked at the potential for re-use in employment use in the plan period (to 2026)</p> <p>Impact on local infrastructure and highways noted. Further information provided on these issues regarding highways requirements and school capacity.</p> <p>Sustainability Appraisal has been prepared by SDC to appraise the site and has been provided to stakeholders</p>
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			<p>these same features also make the site unsuitable to a significant residential development.</p> <p>If SDC believe that it is necessary to include a revised brief for the site, propose that the wording is general, and not over specific. The brief should indicate that any development must be sustainable with a balanced mix of usage, recognising its rural location and limiting the number of housing units that could be built to between 25 and 30, stressing the importance of maintaining the integrity of this small isolated hamlet.</p>	
		Glaxo Smith Kline – site owner	<p>Support allocation – comments on boundary, retention of building 12, accessibility improvements, housing capacity and phasing</p>	<p>For the purpose of any redevelopment, SDC consider that the boundary of the site should be restricted to that of the secure employment site, with the two existing dwellings in GSK's ownership excluded.</p> <p>Retention of building 12 is the recommended approach set out in the URS report. The Council commissioned independent consultants URS to consider the potential for re-use of the site in employment use. Any proposals that does not seek to retain building 12 would need to demonstrate why take-up of this building is not viable in the plan period in line with Core Strategy policy SP8</p> <p>Accessibility improvements and site specific details would need to be</p>

				determined at the planning application stage.
		Environment Agency	Powder Mill Lane to the east of the site will be affected by flooding which could impact on access/egress. The river corridor must be protected and enhanced as part of the development. Any proposals will need to demonstrate that the river corridor will not have additional light spill as a result	Noted –flood risk is referenced in the allocation and would need to be considered at detailed planning application stage.
		KCC Kent Highways	<p>The primary schools serving this rural area are currently at capacity so this allocation may create a deficit in available primary places. 100 dwellings would not generate sufficient pupil numbers to suggest a new school. However, the existing school facilities are close to deficit with expansion at Leigh prohibited by site constraints. Pupils would have to be schooled out of the area in neighbouring settlements.</p> <p>There is Industrial archaeology potential from the gunpowder mills, and a medieval manor close by to west. Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>Recommended access improvements include (1) localised widening of Leigh Road sufficient to enable free-flowing two-way traffic and (2) possible adoption</p>	<p>Noted. Further discussions with KCC Education have indicated that a c£235k contribution would be sought towards improving primary education facilities, and this would be used in a 2-3 mile planning radius.</p> <p>Noted, and this is referenced in the allocation.</p> <p>Noted – accessibility improvements would be required as part of any redevelopment of the site.</p>

			<p>of the (currently private) western access road to the site. If suitably improved, it could provide a direct route from the site to Leigh and an alternative route for Hildenborough – Leigh traffic, avoiding narrow and tortuous route past The Plough Public House.</p> <p>Also desirable would be conversion of footpath SR437A (and MU24 as it is called over the border in Tonbridge) to cycle track status</p>	
		Kent Wildlife Trust	<p>To ensure that all recreational pressure is mitigated it will be important that any future policy specifies that the site incorporates a multifunctional green infrastructure which contains corridors of natural habitat, that link into the LWS and that contributions are obtained to ensure the LWS is protected and managed to ensure no impact on biodiversity as a result of the increased recreational pressure. Open space should also be provided on site if at all possible</p>	<p>Noted. GI and open space to be incorporated in any scheme. This was of particular interest to the local stakeholder working group. Allocation has been modified to seek protection and enhancement of the woodland area and habitats, providing appropriate levels of public access, green buffer zones on the edge of the developed site and open spaces incorporated within the development. A site ecology report has been prepared by North West Kent Countryside Partnership.</p>
		Southern Water	<p>New and/or improved sewerage infrastructure is required before additional flows from this site can be accommodated. This should be reflected in a site specific policy.</p>	<p>Noted and would need to be considered at detailed planning application stage.</p>
		Moat Housing Group	<p>Perfect for an affordable housing development in size, location and nature</p>	<p>Noted. Affordable housing would be incorporated in any scheme, but response from Housing Policy team, following advice from WKHA, Moat and an analysis of the latest Homebuy</p>

				application data from the Zone Agent, 6-8 units of affordable housing are recommended
		Tonbridge & Malling Borough Council	Supports both access routes into the site being retained. The issue of securing a cycle link between the site and Tonbridge Sports Ground should be raised as part of the implementation of the planning permission. While there is a footpath linking these two areas, the opportunity to improve the link as part of the allocation and development of the site should be sought in due course	Noted and cycle route has been raised by Kent Highways services
		Hildenborough Parish Council	Have concerns over traffic management, infrastructure(roads and schools) and flooding	Noted and will continue to liaise with neighbouring authorities on the site
		Local Residents Hunter Seal, Leigh Residents' Association Ladybird Studios Anthony Pratt Karen & John Muchmore Donna Watson	Concerns over traffic management Pressure on infrastructure, flooding, crime levels, village school, doctors. Parking is an issue in Hunter Seal The narrow lanes, without any pavements and several 'blind' corners, are already potentially dangerous to walkers, cyclists and horse riders and cannot safely carry such an increase in traffic The footpath that runs behind one side of Hunter Seal is well used - to increase the volume of pedestrians/cyclists on this path raises concerns in respect of noise	Impact on local infrastructure and highways noted. Noted - accessibility improvements would be required as part of any redevelopment of the site. Noted - accessibility improvements would be required as part of any redevelopment of the site.

		<p>Liz and John Summerton</p> <p>Lynn and Mark Hickson</p> <p>Michael Johnsons</p> <p>Mrs Cooper</p> <p>Starkey</p>	<p>and safety</p> <p>Hunter Seal has an area of woodland which adjoins the GSK site. A development would cause disruption to the wildlife and thus an environmental impact.</p> <p>Any residential development will change this area of Powdermills from a semi rural hamlet to just another housing estate</p> <p>Sevenoaks Council have already reached their quota for housing</p> <p>Any redevelopment on this scale with 'inclusion of accessibility improvements' would drastically alter the rural nature of this location</p> <p>100 houses is too many residents</p>	<p>The woodland area and habitats that surround the site should be protected and enhanced, via a management strategy to be developed in conjunction with the local community, which should provide appropriate levels of public access.</p> <p>The housing provision set out in the Core Strategy does not represent an upper limit of the housing to be provided in the District. Sevenoaks has a number of allocated sites where capacity may change or where delivery may take place on a longer timescale and therefore it is necessary to offer a level of flexibility in terms of the range of available sites.</p> <p>Noted. Allocation revised to refer to low density development (not more than 25 dph)</p>
<u>Warren Court Farm, Halstead</u>	10	Halstead Parish Council	<p>It should continue to be used for small business as the employment provided for local people is important.</p> <p>The GB land associated with Warren Court Farm should be designated an</p>	<p>Site identified in Employment Land Review (2009) as last remaining poor quality site – recent (2011) employment forecast suggests reduction in need for light industrial B1c and B1 offices. Retaining status quo of poor quality employment site in the green belt with allocation to expand, not considered positive planning.</p> <p>In relation to exceptions sites for affordable housing, a site selection process would need to be undertaken -</p>

			Exceptions Site and used for affordable house for Halstead people, in perpetuity	site therefore cannot be allocated for this use. Existing uses on the site mean that there are likely to viability issues in terms of whether this site would come forward as an exceptions site for affordable housing.
		Environment Agency	Owing to the presence of an historic landfill beneath much of the site footprint further contamination investigations and possibly remediation are required. The site is within a sensitive area with respect to groundwater as it is underlain by a principal aquifer and lies within Source Protection Zone 3 for a public water supply	Noted – any remediation issues would be required as part of any redevelopment of the site.
		KCC Highways KCC	There is scope for a footway link from the site to the existing bus stop on the west side of Knockholt Road to the north of the site access and for an informal pedestrian crossing facility to provide a better link to the adjacent bus stop on the east side of Knockholt Road. There is scope within the current constraints to provide an access suitable for a residential use There is general prehistoric potential based on nearby finds. Low level archaeology is anticipated	Noted – accessibility improvements would be required as part of any redevelopment of the site. Noted
		Kent Wildlife Trust	The Trust welcomes the aim to buffer the site and provide natural habitat to extend Deerleap wood	Support noted and welcomed
		Moat Housing Group	The parish and LA need to maintain that provision of affordable dwellings	Noted. Affordable housing is required as part of any residential development

			in this location is central to any changes or proposals	
		Mr I Butler – site owner	Whilst welcoming the proposal the area proposed to be allocated is too small and illogical. The proposal, as put forward, will result in the effective sterilisation of the majority of the site. It would represent an inefficient and gross underdevelopment of a site all of which constitutes previously developed land, contrary to the objective of NPPF policy. The capacity of the site as a whole would be far more than 13, facilitating a substantial increase in the yield of affordable housing to meet local needs. To proceed as the Council suggests would represent a missed opportunity. The allocation of the whole site, preferably accompanied by an adjustment in the village confines boundary, as suggested, would enable the benefits of a redevelopment scheme to be fully realised in terms of the environmental improvements and the housing yield, including the affordable element. The future of the environmental improvement land is unexplained	Noted. Environmental improvement area incorporated into site boundary to facilitate management and maintenance. Rear gardens of units with boundary to Deerleap Wood should incorporate woodland buffer in order to protect and extend the woodland area. Site capacity extended to reflect amended boundary.
		Mr Colin Luther – neighbouring site	Support the concerns raised in relation to design, landscaping, and access. Promoting adjacent Deerleap Farm for 3 new dwellings, exceptions site and environmental improvements	Exceptions sites process led by parish council / would need to be a site selection process, but site may be considered suitable due to proximity to village. Sent the Kent-wide Rural Homes Protocol.

				<p>New buildings considered inappropriate development, but there may be scope for extension/replacement of existing/infilling in line with NPPF and Core Strategy policies</p> <p>Environmental improvements welcomed</p>
		CPRE	<p>The need is for affordable housing; removing the site from the Green Belt, and thus its exception status, would exclude that possibility, other than as a part of a substantial and unnecessary market housing scheme.</p> <p>Change of use would deprive the rural economy of local employment opportunities</p>	<p>In relation to exceptions sites for affordable housing, a site selection process would need to be undertaken - site therefore cannot be allocated for this use. Existing uses on the site mean that there are likely to viability issues in terms of whether this site would come forward as an exceptions site</p> <p>Site identified in Employment Land Review (2009) as last remaining poor quality site -recent (2011) employment forecast suggests reduction in need for light industrial B1c and B1 offices. Retaining status quo of poor quality employment site in the green belt with allocation to expand, not considered positive planning.</p>
		Natural England	Restoration of part of the site and inclusion within the Green Belt designation would be welcomed and encouraged as would the buffer zone to Deerleap Wood	Noted
<u>Broom Hill, Swanley</u>	46	Swanley Town Council	Strongly objects to the proposal to include residential development at the Broom Hill site due to concerns	Concerns noted. Due to strength of local opposition, primarily in relation to concern over access from Beechenlea

			<p>regarding</p> <ul style="list-style-type: none"> highways matters as Beechenlea Lane has only a single footpath and in addition traffic congestion and volume as well as non resident parking is already a concern the inadequacy of the local infrastructure to handle additional housing the potential loss of footpath number 178, which is also not shown on any proposal plans concerns regarding the air quality in the area <p>The Town Council requests that the site be considered to be returned to the Green Belt or adopted as open space.</p> <p>The Town Council is also concerned regarding the consultation process especially as not all residents within the neighbouring road were contacted regarding this consultation</p>	<p>Lane, impact on residential amenity and loss of green space, residential element removed from site allocation.</p> <p>Footpath to be retained</p> <p>Western side of site proposed to be allocated as protected open space (natural/semi-natural land)</p> <p>Noted. All residents of Beechenlea Lane contacted and consultation period extended until 9 August to allow for additional comments. SDC staff presented proposals at residents association meeting</p>
		Environment Agency	<p>Data indicates that the south eastern corner of the site may be affected by surface water flooding. The site lies within a Source Protection Zone 3 and is adjacent to a works site. It should be ensured via normal planning regulations that appropriate site investigations are carried out to screen for any contamination risks from the adjacent works activities</p>	<p>Noted – any flooding issues would need to be considered as part of any redevelopment of the site, via the planning application process</p>
		Highways	<p>The addition of housing to the Broom</p>	<p>Noted - residential element removed</p>

		Agency	Hill site further exacerbates our concerns regarding the site's traffic impact on M25 Junction 3	<p>from site allocation.</p> <p>HA have clarified that this comment 'is putting down a marker as per normal that any development will need to assess and mitigate as appropriate any impact on the SRN, it is not an objection in principle to any development that may impact on M25 J3'.</p>
		KCC Highways KCC	<p>In principle, the site would be suitable for a mixed development of employment served from London Road/ residential development served from Beechenlea Lane and additional open space. The level of employment use that could be supported by London Road can only properly be assessed modelling the traffic flows at the proposed junction with London Road and beyond as necessary. The best means of access from London Road i.e. a roundabout or a signal-controlled junction should be determined by modelling. A signalised junction would be likely to provide more control of the junction to reduce congestion, and would require less land</p> <p>Due to the proximity of the M25 and the M20, the Highways Agency should also be consulted about the employment aspect of this proposal</p> <p>There is scope to accommodate the 2 small housing sites accessed from</p>	<p>Noted. Access improvements would need to be agreed with Kent Highways Services (and the Highways Agency) and incorporated as part of any employment land planning application</p> <p>Highways Agency has been consulted – see comments above.</p> <p>Noted - residential element removed from site allocation.</p>

			<p>Beechenlea Lane but some local improvement works to Beechenlea Lane between the sites and London Road may be required to accommodate the additional vehicle, cycle and pedestrian movements</p> <p>Consideration needs to be given to the additional vehicle movements at the junction of Beechenlea Lane and London Road and to potential mitigation measures to accommodate these additional movements</p> <p>Recommend that any residential proposal here would need to be accompanied by a transport statement which fully addresses the impact of additional vehicle movements at this junction</p> <p>Public transport links and accessibility are reasonable with bus stops close by on the London Road and the sites being within an approximate 10 minute walking distance of the town centre and train station</p> <p>The accesses to the sites from Beechenlea Lane are likely to require adoption and will therefore need to be to an adoptable standard</p> <p>There is general prehistoric and medieval potential associated with nearby finds. Low level archaeology is anticipated</p>	Noted
		Moat Housing Group	Do not deem this site appropriate for residential development	Noted - residential element removed from site allocation.

		Kent Wildlife Trust	Wish to see some guidelines within the policy regarding the level and location of open space and biodiversity mitigation and enhancement	Noted – allocation includes guidance on the location of open space and biodiversity mitigation and enhancement
		Pro Vision Planning & Design – site owner	<p>The level of ‘design guidance’ in the consultation document is too prescriptive and definitive on matters of detail for the purposes of an ‘allocation’ DPD and for the same reasons excludes other possibilities and potentially the opportunity for these to be explored further in a planning application and/or development brief</p> <p>The Council appears to accept that detailed issues are best dealt with at application stage and thus should be omitted from the proposed allocation stage. Support this and the need to remove this contradiction from the consultation document</p> <p>Support the Council’s anticipation that the balance and mix of uses and open space etc. “is to be determined through the planning application process”. This may be informed by Development Brief, but should not be delayed in the absence of a Development Brief. A Development Brief should not be a prior mandatory requirement or pre-requisite which might otherwise inhibit bringing the proposed allocation forward as a comprehensive proposal in a timely fashion</p>	<p>Noted – development guidance intended to assist developers in explaining what form of development is likely to be acceptable on the site.</p> <p>The Council will prepare a revised Development Brief, in accordance with the delivery mechanisms to policy LO4 in the Core Strategy.</p>

			For the reasons explained above there is little real purpose in the proposed allocation plan including the level of detail that is proposed; it should omit these details, annotations and/or areas. Alternatively it should at least review these to reflect circumstances more accurately and objectively at this stage (as well as increase flexibility) and be clearly marked with a status as 'indicative' only	
		Natural England	Site surveys of existing species is undertaken, during optimal times to determine presence or potential, this will help identify scale and design option for any redevelopment proposal at this site	Noted – ecological surveys will need to be undertaken as part of any planning application
		CPRE	The open countryside, visual aspect of this site is very important to Swanley, to avoid creeping development of the built environment towards the M25. It also provides vital open space for the residents of this part of Swanley. The intrusion of new housing would deplete the remaining area of open space, and the increased pressure of people would devalue what remained. The soil is of high agricultural quality, which might be required in the future, so the land should remain undeveloped. In the present economic circumstances there should be more emphasis on encouraging the use of employment sites now left vacant	Noted - residential element removed from site allocation and allocation includes guidance on the location of open space and biodiversity mitigation and enhancement. Employment Forecast identifies a need for 5.2 ha of B8 (warehousing) use in the Core Strategy period to 2026. Broom Hill allocated in Core Strategy to assist in meeting this need.
		Local	<ul style="list-style-type: none"> It has been proved on several 	Concerns noted. Due to strength of local

	Residents/ businesses	previous planning applications that Beechenlea Lane cannot take any more traffic	opposition, primarily in relation to concern over access from Beechenlea Lane, impact on residential amenity and loss of green space, residential element removed from site allocation. Footpath to be retained. Western side of site proposed to be allocated as protected open space (natural/semi-natural land)
	A.J Forwell	•Extra pollution will be caused by the increased traffic	
	Brian Goode	• Beechenlea Lane cannot take increased traffic. It is a used during holdups on the M25 and at rush hour as a rat run	
	D Black	•Parked cars obstruct the vision of residents on one side coming out of their driveways making it extremely dangerous. This lane is heavily used as a long term and short stay car park	Concerns related to traffic impacts on Beechenlea Lane (congestion / parking / access) noted.
	David and Brigid Blacker	•The bend and gradient of the lane makes access onto the road from many existing properties semi blind and hazardous. Any raised volume in residential traffic will increase the danger of road accidents	
	Elaine Strachan	•The local road infrastructure is inadequate to support the additional traffic caused by the development	
	G Collins	• Proposed entrance is far too narrow to be safe it will become a “danger point” for traffic up and down Beechenlea lane	
	J Lee		
	Janet Grant		
	John Bromfield		
	John Nicholls		
	John Sterry		
	K Jefferys		
	Katherine Bull	• There are enough brown sites and other land which is not Green Belt available for this purpose.	Consideration of alternative sites – land at Broom Hill is not in the green belt, although it is green field. Employment Forecast identifies a need for 5.2 ha of B8 (warehousing) use in the Core Strategy period to 2026. Broom Hill allocated in Core Strategy to assist in meeting this need.
	Kathryn Bell	•There are alternatives to the land at Broom Hill – Pedham Place farm.	
	Kay Wellham	There are existing warehouses and office spaces in Swanley lying vacant and ‘to let’	
	Keri Smallwood		

		<p>M Hennessy</p> <p>ME and SE Bentley</p> <p>Marilyn and Philip Ball</p> <p>Matt Black</p> <p>Mr & Mrs Miles</p> <p>Mr R.J Neaves</p> <p>Mr and Mrs Clements</p> <p>Nigel Sivyver</p> <p>Noreen Forwell</p> <p>Pamela Strachan</p> <p>Ramac Holdings Ltd c/o Barton Wilmore Planning Partnership (Simon Flisher)</p> <p>S Hennessy</p> <p>Sean Bromfield</p>	<ul style="list-style-type: none"> • Pollution from the M25 is mitigated a little by Broom Hill and any attempt to lessen or remove the natural barrier would be detrimental to everyone in this part of Swanley • The area is in one of the Sevenoak's Air Quality Management Areas • Health Problems - the local population will be put at risk from respiratory conditions if they are living and working in an area of poor air quality. Noise pollution from the M25/M20/A20 will negatively impact on the residents and workers by causing noise stress and cause harm to their health and well being • The 1995 SDC development Brief recommended that the land at the rear of the properties in Beechenlea lane should remain open and undisturbed to act as a buffer from the noise and pollution of the M25 so this land cannot be flattened to accommodate housing • Current utilities and sewerage systems will be inadequate to support such further development. • If the Council thinks there is a need for more housing in Swanley, the proposed increase from 116 units to 250 units on the United House site will cater for this • The 1996 report stated Residential not required. What has changed? 	<p>Issue of Broom Hill acting as an air quality/noise buffer for M25 – noted - Western side of site proposed to be allocated as protected open space (natural/semi-natural land), together with biodiversity mitigation and enhancement.</p> <p>Noted – residential development not now proposed. Housing targets for areas do not represent a maximum. The Council's Core Strategy sets out the amount of additional housing that different parts of Sevenoaks District will be expected to accommodate. Of a total of approximately 3560 dwelling anticipated to be developed in the period 2006-</p>
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		<p>Suzanne Bull</p> <p>T J Osborne</p> <p>Terence Bull</p> <p>West House Transport (S&G) Ltd (Tracey Moseley)</p> <p>Jane Sivyer</p> <p>John Manning</p> <p>Norman Taylor</p>	<ul style="list-style-type: none"> • More and more open spaces in Swanley are disappearing • To protect our Green Open Space the Land use must be re-classified as Green Belt and must continue to remain as Green Open Space. • Loss of green open space and wildlife habitats having an impact on biodiversity. If the proposed development goes ahead much of this green land will become covered in concrete • Biodiversity - In April 2010 the Kent Wildlife Trust objected to identifying this land for development. There is known to be a wide range of flora and fauna here including many different butterflies, birds, toads and badgers. It is one of the few remaining open spaces in our town. There must be less ecologically sensitive sites in Swanley which can be considered for development • This area should not have lost its Green Belt status in the first place • There are many existing and well used footpaths over the Broom Hill site and trust that these will be preserved. Broomhill is the highest point in Swanley • The residential element needs to be removed and the areas where they are marked to be replaced with open space as per the agreement of the 	<p>2026, Swanley is expected to accommodate approximately 660 (around 18.5%).</p> <p>Concerns related to loss of open space / biodiversity / habitats / footpaths noted.</p> <p>Residential element removed from site allocation. Footpath to be retained. Western side of site proposed to be allocated as protected open space (natural/semi-natural land)</p>
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			<p>Public Enquiry</p> <ul style="list-style-type: none"> • There will be increased risk of flooding when heavy rain falls in the area because of increased surface run-off with nowhere for the water to drain • The area of the development marked as 'previously developed land' is not 'Brown Field' because it previously was used agriculturally and had a few greenhouses • The proposed residential development in the field adjoining the houses at the rear of the lower end of Beechenlea Lane and the rear of the old Kimber Allen building, the steepness of the land would make this most unsuitable for a housing development • Support development at Broom Hill particularly for Employment. This area needs a Hotel as it is strategically next to Junction 3 of the M25, the A/M20, and only minutes from the Dartford crossing. A second hotel which would offer employment as well as a much needed second facility • Must ensure that the Site Allocation meets the tests of soundness, which includes the provision that "the plan should be deliverable over its period". The deliverability of land at Broom Hill Road, including the deliverability of the access arrangements, must therefore be given clear and careful 	<p>Concerns regarding flooding noted and would need to be address in any planning application</p> <p>Development not now proposed on this land</p> <p>Topography of the site noted - development not now proposed on this land</p> <p>Support noted. Employment elements of the allocation retained. Hotel proposals not included in the allocation, but would be considered as part of any planning application process.</p> <p>Noted – site owner promoting site for development and has proposed access to employment site via industrial estate to the south</p>
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			consideration	
<u>Broom Hill</u> Additional comments – supplementary consultation	19	Local Residents Barbara Nicholls ME and SE Bentley Nigel Sivyer Mr and Mrs Clements Marilyn and Philip Ball Brian Goode Michael Hogg Terence Bull Maureen Bromfield Stephen & Margaret Partridge Claire Strachan Elaine Strachan	Houses are to be built in a known polluted area. More development will add to the air, light and noise pollution in the area. Concern over health risks for new residents and the impact on Air Quality Management Areas, The land should be maintained as a natural barrier or returned to GB and planted with suitable numbers of plants and trees to try and mitigate the high pollution levels Congestion Increase in traffic in the lane for access to a new estate would place an intolerable burden on the lane and local road network. It is a rat run for traffic to escape the grid lock and congestion on the surrounding roads and M25 Pressure on facilities Swanley does not have the infrastructure capacity to support more housing. It will put more strain on doctors/schools and the road network. Wildlife This should be a major consideration. The Kent Wildlife Trust has already identified Broom Hill as being a rare habitat for Bats. Local residents are against the proposed development and they are backed by Swanley Town Council.	Residential element removed from site allocation. Western side of site proposed to be allocated as protected open space (natural/semi-natural land) Residential element removed from site allocation. Employment land access to the from south via existing industrial estate Noted. Residential not now proposed Residential not now proposed, but development is required to address infrastructure impacts via mitigation or financial contributions Western side of site proposed to be allocated as protected open space (natural/semi-natural land), together with biodiversity mitigation and enhancement. Noted. Residential not now proposed on

		<p>Teresa O'Brien</p> <p>Mr R Sydney</p>	<p>There seems to be several other sites available for development within Swanley</p>	<p>site.</p>
		<p>Cllr Roger Gough Kent County Council</p>	<p>I wish to object to proposals to expand both commercial and residential use on this site. These proposals will have a significant and damaging impact on the residents of Beechenlea Lane, increasing traffic and pressure on local services, increasing existing air quality problems and damaging a distinctive habitat and biodiversity, as well as residents' amenity. The existing space provides some sort of buffer between the M25 and the houses on Beechenlea Lane; this should not be eroded, especially not by putting more residential properties in an area of poor air quality.</p> <p>As for employment there seems already to be an oversupply in this part of Swanley, and I note that the Council has already revised down many of its requirements (for office and factory uses) between the Employment Land Review in 2007 and the new forecasts in 2011.</p> <p>Local people are unhappy that the site was removed from the Green Belt . I share these concerns. The site should be returned to Green Belt; if that is not possible, it should be designated</p>	<p>Concerns noted. Due to strength of local opposition, primarily in relation to concern over access from Beechenlea Lane, impact on residential amenity, air quality and loss of green space, residential element removed from site allocation.</p> <p>Western side of site proposed to be allocated as protected open space (natural/semi-natural land), together with biodiversity mitigation and enhancement.</p> <p>The updated Employment Forecast (2011) identifies a need for 5.2 ha of B8 (warehousing) use in the Core Strategy period to 2026. Broom Hill allocated in Core Strategy (4.1ha) to assist in meeting this need.</p> <p>Western side of site proposed to be allocated as protected open space (natural/semi-natural land). To return the land to the Green Belt, exceptional circumstances would need to be</p>

			as open space.	demonstrated.
		The London Green Belt Council (Cedric Hoptroff)	<p>This site was removed from the Green Belt because it was considered that, exceptionally, there was a need for employment land. It is doubtful that now any employment use is necessary on this site and it should revert to its original Green Belt status.</p> <p>If retaining land for employment uses can be justified, then the SE corner is the most appropriate place. There is no justification for the housing. It is not necessary to meet the requirement and is unsuitable in traffic terms as it would put undue pressure on Beechenlea Lane.</p> <p>The description of the land where the housing is proposed as 'PDL' is inappropriate. It appears that any building was not substantial and, in any case, has largely disappeared; the land having been reclaimed by nature. The parts of the site not required for employment use should be Green Belt.</p>	<p>The updated Employment Forecast (2011) identifies a need for 5.2 ha of B8 (warehousing) use in the Core Strategy period to 2026. Broom Hill allocated in Core Strategy (4.1ha) to assist in meeting this need.</p> <p>SE corner of the site considered to be the most appropriate place for employment – as indicated on the allocation plan. Residential development not now proposed.</p> <p>Residential development not now proposed on this site.</p>
		Natural England (David Hammond)	<p>The provision of enhancements and improvements to existing habitats/ green belt and to the public rights of way are welcomed and broadly supported, The allocation of open space is also welcomed. It is advised that site surveys of existing species is undertaken, during optimal times to determine presence or potential, this</p>	<p>Noted and support welcomed.</p> <p>Ecological surveys will need to be undertaken as part of any planning application</p>

			will help identify scale and design option for any redevelopment, and identify opportunities for enhancement and improvements.	
		Highways Agency	No further comment	Noted
		Environment Agency	No further comment	Noted
<u>United House, Swanley</u>	28	Swanley Town Council	<p>Strongly objects to the proposal to increase the residential capacity at the United House site due to concerns regarding</p> <ul style="list-style-type: none"> • the over intensive nature that such a large development would bring and that the original proposal of 116 units be maintained or a housing density similar to that of the High Firs estate • the loss of an employment site in the town, in an area with high unemployment <ul style="list-style-type: none"> • highways concerns regarding the volume of traffic that would arise due to a site of this size as well as the inadequate single access proposal for emergency vehicles • the loss of the existing buffer that the site currently gives residents on the High Firs estate from the Swan Mill industrial site 	<p>Concerns noted.</p> <p>Density proposed at 75dph and site to accommodate a range of housing types (i.e. houses and flats)</p> <p>Regarding the loss of an employment site, the owners have provided marketing evidence to suggest there would be limited interest in re-use of the site. The site lacks a visible frontage, has limited access and contains an out-of-date facility, that would need to be refurbished /redeveloped. The existing owners intend to relocate their business within Swanley.</p> <p>Kent Highways Services have not raised a concern regarding transport impacts and access to this site</p> <p>Allocation notes that the design, layout and orientation of the scheme is important in ensuring a satisfactory relationship with the adjacent commercial use, and that parking, landscaping and open space may be</p>

				used to provide a buffer
		Environment Agency	Data indicates that part of the proposed site may lie in an area that is susceptible to surface water flooding. Historic land uses for industrial purposes mean that site investigation (and possibly remediation) must take place. The site is underlain by sensitive aquifers and falls within Source Protection Zone 3	Noted – any flooding/contamination issues would need to be considered as part of any redevelopment of the site, via the planning application process
		Highways Agency	The proposed increase in residential development at United House, represents a potentially material change to the agreed levels and given our concerns with the Broom Hill site this further enhances the need for detailed assessment at M25 Junction 3	Noted –highways capacity issues would need to be considered as part of any redevelopment of the site, via the planning application process
		Kent Wildlife Trust	Recommend retention of the tree lines along the boundary. The 1.91 ha of constrained land could be used as semi natural open space which would go some way to delivering the deficit currently present at Swanley as well as providing an important asset to the GI	Noted
		KCC KCC Highways	There is general potential for prehistoric activity based on flint tool finds, and Romano-British cremation recorded from the area. Low level archaeology is anticipated In principle the site would be a suitable site to accommodate this proposal subject to the following	Noted Highways comments noted and issues would need to be addressed in any future planning application

			<p>widen and/or reconstruct the primary access road to the site from Goldsel Road to provide a carriageway and footway, There is a need to secure a secondary means of emergency vehicular access to the site from the highway network - one potential option being the further widening of the primary access road to accommodate a carriageway dualling arrangement</p> <p>Visibility at the junction with the B258 is slightly limited to the south Furthermore, the primary vehicular access is a straight route following a fixed alignment and would therefore require significant traffic calming measures to limit vehicle speed. Scope for local bus routes and cycle routes to be reviewed</p>	
		Moat Housing Group	This site would be ideal for residential development however the proximity of the industrial units needs careful design to be considered (noise, pollution etc.)	Noted. Allocation notes that the design, layout and orientation of the scheme is important in ensuring a satisfactory relationship with the adjacent commercial use, and that parking, landscaping and open space may be used to provide a buffer
		High Firs Primary School	<p>Want to ensure consideration is given to the following:</p> <ul style="list-style-type: none"> - access to the school needs to be considered to maintain safe access for pupils and staff - the impact to the school intake needs to be considered in terms of the existing and future catchment area 	<p>Noted. Allocation sets out that any proposals must address proximity and any impacts on the neighbouring school</p> <p>KCC Education will make recommendations in relation to school infrastructure in relation to a planning application e.g. by seeking contributions to improve school facilities.</p>

			<ul style="list-style-type: none"> - an assessment is required to understand the environmental impact of increasing the density of the development - the direct impact to the school property needs to be considered as this development adjoins the school perimeter 	
		United House – site owner	<p>Consider a higher density can be achieved, however appreciate that the final form and scale of development will be considered in detail as part of any future planning application. Support the comments within Appendix 1 in relation to the site, and note that careful consideration will be given to the adjoining uses in designing the scheme</p>	Support noted
		Swan Paper Mills – neighbouring site	<p>Should remain for a mixed use development with the predominant part of the site and certainly at least 2 hectares. Should be retained for business use in order to provide an appropriate buffer to the Swan Paper Mill Company Ltd boundary, consistent with the Council's initial assessment and consistent with its stance at the Core Strategy examination</p>	<p>Noted. Allocation notes that the design, layout and orientation of the scheme is important in ensuring a satisfactory relationship with the adjacent commercial use, and that parking, landscaping and open space may be used to provide a buffer.</p> <p>Regarding the loss of an employment site, the owners have provided marketing evidence to suggest there would be limited interest in re-use of the site. The site lacks a visible frontage, has limited access and contains an out-of-date facility, that would need to be refurbished /redeveloped. The existing owners intend to relocate their business within Swanley.</p>

	Local Residents	<ul style="list-style-type: none"> Any buildings or residential properties on the site should be no more than 2 storeys 	Design comments noted. The allocation notes that the site should accommodate a range of housing types (i.e. houses and flats).
	A F Webb	<ul style="list-style-type: none"> Concern over the effect on existing properties on Pinks Hill or High Firs i.e. - privacy, security 	
	Ann Buchan		
	D Isted	<ul style="list-style-type: none"> Only 116 units at 75 dwellings per hectare should be built. The proposed density is too high 	75 dph is recommended, but the overall number of units has increased due to the extended site area
	Darren Francis	<ul style="list-style-type: none"> All of the dwellings consist of private housing for sale only. There should not be any socially mixed housing. The site should not be made into a mixed-tenure estate. 	Affordable housing will be sought on all sites in line with Core Strategy policy SP3
	David Blaikie		
	Francis Patrick		
	J Bryan	<ul style="list-style-type: none"> Traffic - Goldsel Road is a busy local road with existing traffic problems, particularly at peak times. These will only be exacerbated by high density development and associated traffic generation 	Highways comments noted and issues would need to be addressed in any future planning application
	K Jefferys		
	Kevin Searles		
	Long	<ul style="list-style-type: none"> Traffic safety Goldsel Road is already an accident black spot to increase the number of vehicles exiting from one access from 250 new homes is going to make the situation worse 	
	Mark J Price		
	Haworth		
	Michael Crawley	<ul style="list-style-type: none"> Land should not be allocated for houses if there are clear opportunities to sustain, improve or expand a key local business 	Regarding the loss of an employment site, the owners have provided marketing evidence to suggest there would be limited interest in re-use of the site. The site lacks a visible frontage, has limited access and contains an out-of-date facility, that would need to be refurbished /redeveloped. The existing owners intend to relocate their business within Swanley.
	Mr R.J Neaves		
	Mr Woodger		
	Phil Stevens	<ul style="list-style-type: none"> Any significant increase in the number of dwellings in this part of the town will place greater pressure on the 	
	Robert		

		Alexander Shan Phipps Susan Fagen Tracy Mihill	<p>local primary school, and may necessitate significant upgrades to the existing local infrastructure e.g. water, sewage & other utilities</p> <ul style="list-style-type: none"> • Any development on this site will decrease the valuation on properties, especially if it has a large proportion of HA units • Could an area be kept as a wildlife area • Expect that a playground and some trees or other planting be a requirement • Increased air pollution • Drainage problems on the Greenacres and High Firs • Problems with the main sewer on the Swanley bypass by the Goldsel Road bridge not able to cope with the present housing 	<p>Noted. Any impacts on infrastructure will be mitigated via the imposition of a legal agreement requiring infrastructure / contributions</p> <p>Not an issue considered by planning</p> <p>Site should include open space / landscaped areas, and retention of the pond at the southern end of the site</p> <p>Any environmental issues would need to be addressed as part of any planning application on the site</p>
<u>Land rear of Premier Inn, Swanley</u>	6	Swanley Town Council	Supports the proposal that the Premier Inn site remains as solely employment use	Support noted
		KCC Highways KCC	<p>There are no highway objections to this proposed allocation</p> <p>There is general prehistoric and medieval potential associated with nearby finds. Low level archaeology is anticipated</p>	<p>Noted</p> <p>Noted</p>

		Kent Wildlife Trust	No objections	Noted
		Moat Housing Group	This should not be considered for affordable development	Noted. The proposal is to maintain employment on this site (not housing)
		Local Resident Mr R.J Neaves	Support the change to Employment land at the rear of Premier Inn from Residential as local unemployment is high	Support noted
<u>West Kingsdown Industrial Estate</u>	3	West Kingsdown Parish Council	Happy with the proposal being made	Support noted
		KCC Highways KCC	There are no highway objections to this proposed allocation There are no existing ecological site designations, appear limited habitat opportunities for protected species and no known remains within 500m. Low level archaeology is anticipated which could be dealt with through suitable conditions on a planning approval (Grade 4).	Noted Noted
<u>Other Comments</u>	15	Colin Luther Associates	Land adjacent should be considered in the same way as Warren Court Farm. This would mean an amendment to the GB boundary and the construction of a proposed 3 new houses and a care home or affordable housing, with environmental improvements.	Exceptions sites process led by parish council / would need to be a site selection process, but site may be considered suitable due to proximity to village. Sent the Kent-wide Rural Homes Protocol. New buildings considered inappropriate

				<p>development, but there may be scope for extension/replacement of existing/infilling in line with NPPF and Core Strategy policies</p> <p>Environmental improvements welcomed</p>
		Royal Mail	<p>Royal Mail's Edenbridge DO/ST Given the site's Town Centre location and the range of uses in the immediate surrounding area, we remain of the opinion that this site provides a good opportunity for comprehensive residential mixed use development in the future. Therefore, should Royal Mail no longer require their site, this site would provide a good opportunity for future comprehensive residential mixed use development therefore request that the Council includes their Edenbridge DO/ ST site for residential or residential led mixed-use development including retail uses</p> <p>Notwithstanding our promotion of Royal Mail's site for inclusion within the Council's ADM DPD we would like to reiterate that should their site come forward for redevelopment in the future, the relocation/re-provision of Royal Mail's existing operations would be required prior to any redevelopment of that site</p>	<p>The site falls below the 0.2ha threshold for site allocation</p> <p>The delivery office falls within the town centre boundary and on the primary frontage (central area). Core Strategy policy L06 seeks to protect a mix of retail and service uses in the town centre. Saved local plan policy EB2 seeks to maintain A1 uses at ground floor and Draft Policy LC3 (Edenbridge TC) sets out that within the central area, A1 uses will be maintained (and other A class and retail uses). The aim is to focus retail development on the central area.</p> <p>It is acknowledged that the sorting office is sui generis. Residential mixed use development including retail uses may be appropriate on the site, but as the site is below the threshold, this should be progressed via the planning application process.</p> <p>It is welcomed that any Royal Mail services would be re-provided before any redevelopment of the site</p>
		Savills	Seven Acres, Crockenhill, Swanley	The proposed land for development is in

			<p>The strong tree boundary separates the housing on Seven Acres from the open countryside to the east</p> <p>It is considered that there are currently a limited number of available sites within the village, and by allowing small scale development adjacent to the village boundary this will avoid putting pressure on the existing urban area to accommodate future residential development</p> <p>The topography of the site and surrounding landscape is such that it relates back to the existing built form of the village, and development of the site will have a negligible impact</p> <p>The site itself currently provides open amenity space of no significant value. There is an abundance of open space in the local area which provides amenity space of value for the local community. It is therefore considered that the site does not contribute to the openness and distinct character of the Green Belt surrounding Crockenhill</p> <p>The site is entirely suitable to accommodate small scale residential development.</p> <p>A minor adjustment should be made to the Green Belt boundary to exclude</p>	<p>the green belt and is therefore not suitable for residential development. The Core Strategy has set out that 3300 housing target will be met within the built confines of existing towns and villages within the District.</p> <p>The Council has a policy related to rural exceptions sites for affordable housing (SP4). If the landowner is interested in this form of development, the parish council should be contacted, as this process needs to be endorsed by the parish council, who would then undertake a local needs assessment and site selection process, in conjunction with the district council.</p>
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			the site identified on the enclosed plan	
		Sevenoaks Town Council	<p>Land at Greatness Park Cemetery, Seal Road, Sevenoaks (Sevenoaks Town Council) promoted</p> <p>Sevenoaks Town Council reiterates representations seeking the removal of a section of Greatness Cemetery's frontage from the Metropolitan Green Belt.</p> <p>Town Council does not seek to "release" any land from the Green Belt, rather it contends that the site is afforded protection inappropriately and erroneously, and as such the Town Council seeks remedial modification to the boundary line. Such a modification is not in conflict with the NPPF, or the Sevenoaks Core Strategy. The site in question makes up less than 0.0015% of the Sevenoaks Metropolitan Green Belt, occupying approximately 0.5 Hectares.</p>	<p>The site is in the Green Belt where there is a presumption against development. The Core Strategy sets out that Green belt land will not be released to meet development needs up until 2026. The release of the site for development would therefore be contrary to the NPPF and the Sevenoaks Core Strategy. The site is of a significant size and scale therefore the consideration as a minor GB amendment would not be appropriate. The site provides an important break in development and views into / access to the green belt north of Sevenoaks.</p> <p>Cemeteries are also considered to be an important part of the wider Green Infrastructure Network.</p>
		Calford Seaden LLP	Land Adjacent Dawson Drive / College Road, Hextable, Swanley, Kent – promoted for residential development.	<p>This proposal relates to the open amenity land adjacent to site of the Manzoori clinic, within the confines of the village of Hextable</p> <p>Although this site was not designated as protected open space within local plan policy (EN9), it has been identified as amenity open space as part of our Open Spaces Study (2009), and the Council's Core Strategy and emerging ADMP seek</p>

				<p>to protect open space that is of value to the local community.</p> <p>Therefore the proposal to allocate this land for residential development is not accepted</p>
<u>General Comments</u>		Cooper Estates Ltd	<p>Comments regarding amalgamation of Allocations and Development Management policies into one document and related SA, specifically in relation to policies on housing for the elderly. Comments on sites which have been recommended as being suitable for housing for older people.</p>	<p>Noted. Allocations and Development Management Plan combined into one document, to provide a more concise and efficient plan, in line with the intentions of the NPPF to streamline policy documents. Several rounds of consultation have been undertaken on this document, which have been accompanied by SA reports.</p> <p>The Policy on New Residential Care Homes (previously Policy H5) has been deleted since it was worded as a negative policy that sought to restrict the location of these uses. The Council strongly supports the provision of housing to meet the requirements of people in special need of help or supervision where they are fully integrated into existing communities and located in sustainable locations. The housing allocations proforma now identify sites that are particularly suitable for housing specifically designed for older people (including those with special needs).</p> <p>Core Strategy policy SP5 is supportive of housing developments to meet the need</p>

				of older people in sustainable locations. Sites that are suitable for providing house for older people have been identified.
		Bexley Council	No comments	Noted
		Hopgarden Lane RA	Re-iteration of concerns over proposals for Hopgarden Lane	<p>Noted. Following consultation the proposed allocation for the site has been amended and the number of units reduced in order to reflect the site constraints.</p> <p>The site capacity has been reduced for both sites (School House reduced by 18 units and Johnsons by 16 units) in order to better reflect the character and density of the neighbouring area and to reflect the site constraints, such as TPO trees, topography and open space. The design guidance in the allocation now suggests conversion of the existing buildings or replacement on a similar footprint, and a small number of units (4-6) at the lower end of the sites.</p>
		Southern Water	<p>Southern Water is the waste water service provider for the south of Sevenoaks District. Identified and assessed, with respect to sewerage capacity and infrastructure crossing the sites, the three residential sites which fall within this area, and further site specific comments provided on:</p> <ul style="list-style-type: none"> • Leigh Builders Yard, Edenbridge • Station Approach, Edenbridge • Glaxo Smith Kline, Leigh 	Comments on specific sites noted
		Thames Water	It will be essential to ensure that the	Noted and water/sewerage

			introduction of a portfolio of Local Development Documents (LDDs) does not prejudice adequate planning for water and sewerage infrastructure provision as this is an essential pre-requisite for development. It is essential to ensure that adequate water and sewerage infrastructure is in place prior to development taking place, in order to avoid unacceptable impacts on the environment, such as sewage flooding of residential and commercial property, pollution of land and watercourses, or water shortages with associated low-pressure water supply problems.	infrastructure for individual sites will be addressed via the planning application process
		Environment Agency	Recommend that you ensure that there is clear evidence within your document showing how you have carried out the sequential test to identify the above sites for proposed development over those that have not been taken forward	Noted. SHLAA assessed site constraints, including whether any percentage of the sites fell within a Level 2 or Level 3 flood zone. Sites that had large constrained areas were removed from consideration at this stage.
		KCC	Keen for employment land to be retained where feasible, however it is understood that some of these site have become unviable and maybe more suited to a mix of uses particularly where they can facilitate the regeneration of a site	Noted
		Kent Police	No comments	Noted
		KWT	Welcome the fact that previous consultation comments have been incorporated into the design guidance. Value the close working relationship	Noted and support welcomed

			<p>established between KWT and Sevenoaks District Council during the LDF process.</p> <p>Detailed comments on sites provided.</p> <p>Where employment has been changed to residential there is likely to be a greater impact on the surrounding natural habitat due to recreational pressure. This is particularly pertinent if no other areas of open space occur within the locality.</p>	<p>Detailed comments on sites noted in the specific sections</p>
		Natural England	<p>Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life</p> <p>This could be made explicit in the Site Allocations document, helping to ensure the borough's green infrastructure is designed to deliver multiple functions</p> <p>Open spaces and public realm should seek to incorporate "soft" landscaping and green infrastructure, where appropriate, as part of a sustainable approach to development.</p> <p>In some cases the development of sites and the operation of policies can have limited impact on the natural environment</p>	<p>Noted – allocations reference biodiversity and natural environmental protection and enhancement where applicable and this is supported by Core Strategy policy SP10</p>