

Appendix 3 - Supplementary Site Allocation Consultation March-May 2012

Summary of Comments received

Site Name	No of Comments	Organisations
Bovis Manor House, New Ash Green	32	Ash-cum-Ridley Parish Council KCC Highways Kent County Council Moat Housing Group Kent Wildlife Trust Knights Croft Residents Society New Ash Green Village Association Limited Over Minnis Resident's Society Punch Croft Residents Society Friends of the New Ash Green Centre District Councillors - Ash and New Ash Green Ward Environment Agency Bovis Homes Ltd – site owner Local Residents
Currant Hill Allotments, Westerham	16	Cooper Estates Ltd Environment Agency KCC Kent Wildlife Trust Moat Housing Group Natural England Sport England Westerham Parish Council – site owner Local Residents
Station Approach, Edenbridge	20	Cooper Estates Ltd Edenbridge Town Council Environment Agency Southern Water KCC Kent Wildlife Trust Network Rail – site owner Moat Housing Group Local Residents
Leigh's Builders Yard, Edenbridge	10	Cooper Estates Ltd Edenbridge Town Council Environmental Agency KCC Kent Wildlife Trust Moat Housing Group Southern Water The Leigh Family – site owner Local Residents
GSK, Powder Mills, Leigh	19	Environment Agency Glaxo Smith Kline – site owner KCC Kent Wildlife Trust Southern Water Moat Housing Group Leigh Parish Council Tonbridge & Malling Borough Council Hildenborough Parish Council

		Leigh Parish Council Hunter Seal, Leigh Residents' Association Local Residents
Warren Court Farm, Halstead	10	Environment Agency Halstead Parish Council KCC Highways KCC Kent Wildlife Trust Moat Housing Group Mr I Butler – site owner Mr C Luther – neighbouring site CPRE Natural England Local Residents
Broom Hill, Swanley	45	Environment Agency Highways Agency KCC Highways Moat Housing Group KCC Kent Wildlife Trust Pro Vision Planning & Design – site owner Natural England Swanley Town Council CPRE Local Residents
United House, Swanley	28	Environment Agency Highways Agency Kent Wildlife Trust Moat Housing Group KCC KCC Highways High Firs Primary School Swan Paper Mills – neighbouring site United House – site owner Swanley Town Council Local Residents
Land rear of Premier Inn, Swanley	6	KCC Highways KCC Kent Wildlife Trust Moat Housing Group Swanley Town Council Local Residents
West Kingsdown Industrial Estate	3	West Kingsdown Parish Council KCC Highways KCC

Summary of Comments received

Bovis Manor House, New Ash Green

Local Residents Comments

- Loss of privacy
- Additional noise and pollution
- Extra traffic
- 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
- Harmful effect on the unique residential and visual amenity of New Ash Green.
- Density too high
- Result in over use of local services/ amenities i.e. primary school and doctor's surgery
- Needs considerable road widening alongside safer pedestrian crossings and routes to the centre
- No mention of the possibility of affordable housing
- Viability is questionable
- 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.
- Development must respect the surrounding neighbourhoods
- 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
- Give consideration to provision of housing for older people and those with special needs
- **Kent Highways** 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
- **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
- **Bovis Homes Ltd** Fully supports and endorses the conclusions and recommendations
- **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.
- **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.
- **Environment Agency** Data indicates that part of the proposed residential site may lie in an area that is susceptible to surface water flooding
- **KCC** What type of housing/facility this could be, as it is described as being suitable for older people and people with special needs. 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

Currant Hill Allotments, Westerham

Local Residents Comments

- 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?
- The 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
- **Moat Housing Group** Support if the allotment could be moved
- **Westerham Parish Council** 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.
- **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
- **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
- **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
- **KCC** 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
- **Sport England** Object to the allocation of the land adjacent to Currant Hill Allotments, Westerham (Former Safeguarded Land) as a replacement allotment site

Station Approach, Edenbridge

Local Residents Comments

- Will put additional strains on over-stretched infrastructure
- 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 causing minimal disturbance to adjacent residential areas
- Access from Greenfield would be impracticable due to the steep embankment without creating a tortuous zigzag service road
- Vehicular access should be restricted to via Station Approach
- 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
- Any development must have ample amount of parking
- It would increase traffic and noise, and would allow vehicles to travel faster
- The loss of vegetation barrier and mature trees and the wildlife-rich strip of land
- Housing in close proximity to a station and track is inappropriate for the elderly and vulnerable.
- 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
- 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
- Value of properties would decrease, would seek to be compensated
- Single Storey/Bungalow style only acceptable. Thus more suitable to those residents quoted "Older people and those with special needs"

- Concerned that this proposal could affect the future ability to extend the platform at Edenbridge Town station which is urgently needed
- 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
- 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
- This residential development seems a good use of the land
- **Edenbridge Town Council** - Support
- **Moat Housing Group** - Perfect for an affordable housing development in size, location and nature
- **Environment Agency** Data indicates that part of the proposed residential site may lie in an area that is susceptible to surface water flooding
- **Kent Wildlife Trust** 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
- **KCC** 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
- **South 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
- **Network Rail** Considers that the existing 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
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
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
Whilst Network Rail supports the on going regeneration of Edenbridge 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

Leigh's Builders Yard, Edenbridge

Local Residents Comments

- 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.
- **Edenbridge Town Council** Support the proposed changes that Leigh's Builders Yard should become residential rather than employment
- **Moat Housing Group** - Perfect for an affordable housing development in size, location and nature
- **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

- **Kent Wildlife Trust** No objections to residential development within this site, providing any recreational pressure on the River Eden LWS is mitigated
- **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
- **KCC** 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

GSK

Local Residents Comments

- Concerns over traffic management
- Pressure on infrastructure The village school, doctors
- Flooding
- Increase in crime
- 100 houses is too many residents
- 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 and safety
- Parking is an issue in Hunter Seal
- 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.
- Any residential development will change this area of Powdermills from a semi rural hamlet to just another housing estate
- Sevenoaks Council have already reached their quota for housing
- 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
- Any redevelopment on this scale with 'inclusion of accessibility improvements' would drastically alter the rural nature of this location
- **Moat Housing Group** Perfect for an affordable housing development in size, location and nature
- **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
- **Kent Wildlife Trust** 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.
- **Hildenborough Parish Council** Have concerns over traffic management, infrastructure and flooding
- **Southern Water** 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.
- **KCC** The primary schools serving this rural area are currently at capacity so this allocation may create a deficit in available primary places. This puts into question the sustainability of such a development through current insufficient levels of community infrastructure. 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.
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

Tonbridge and Malling BC 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

- **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 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. A housing development would have a catastrophic effect on the infrastructure: roads, utilities and local schools

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.

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 these same features also make the site unsuitable to a significant residential development.

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.

Warren Court Farm, Halstead

- **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
- **Adjoining property** - Support the concerns raised in relation to design, landscaping, and access. Promoting adjacent Deerleap Farm
- **Halstead Parish Council** It should continue to be used for small business as the employment provided for local people is important. The GB land associated with Warren Court Farm should be designated an Exceptions Site and used for affordable house for Halstead people, in perpetuity

- **KCC Highways** 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
- **Moat Housing Group** The parish and LA need to maintain that provision of affordable dwellings in this location is central to any changes or proposals
- **CPRE** 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. Change of use would deprive the rural economy of local employment opportunities
- **The 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
- **Kent Wildlife Trust** The Trust welcomes the aim to buffer the site and provide natural habitat to extend Deerlap wood
- **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 Deerlap Wood
- **KCC** There is general prehistoric potential based on nearby finds. Low level archaeology is anticipated

United House

Local Residents Comments

- Any buildings or residential properties on the site should be no more than 2 storeys
- Concern over the effect on existing properties on Pinks Hill or High Firs i.e. - privacy, security
- Only 116 units at 75 dwellings per hectare should be built. The proposed density is too high
- 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.
- **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
- Land should not be allocated for houses if there are clear opportunities to sustain, improve or expand a key local business
- Any significant increase in the number of dwellings in this part of the town will place greater pressure on the local primary school, and may necessitate significant upgrades to the existing local infrastructure e.g. water, sewage & other utilities
- 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
- **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
- 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
- **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.)
- **KCC Highways** In principle the site would be a suitable site to accommodate a residential proposal of this size subject to the following being addressed
widen and/or reconstruct the primary access road to the site from Goldsel Road to provide a carriageway and footway, There is a need with this level of development to secure a secondary

means of emergency vehicular access to the site from the highway network with one potential option being the further widening of the primary access road to accommodate a carriageway dualling arrangement

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

- **The 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
- **The 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 (located in close proximity to the east) this further enhances the need for detailed assessment at M25 Junction 3
- **Swanley Town Council** Strongly objects to the proposal to increase the residential capacity at the United House site due to concerns regarding
 - 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
 - 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
- **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
- **KCC** 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
- **Site owner** 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
- **Swan Paper Mill Company Limited** Should, therefore, 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
- **High Firs Primary School** Want to ensure consideration is given to the following:
 - 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
 - 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

Land rear of Premier Inn, Swanley

Local Residents Comments

- Support the change to Employment land at the rear of Premier Inn from Residential as local unemployment is high
- **Moat Housing Group** This should not be considered for affordable development
- **Swanley Town Council** Supports the proposal that the Premier Inn site remains as solely employment use
- **KCC Highways.** There are no highway objections to this proposed allocation

- **KCC** There is general prehistoric and medieval potential associated with nearby finds. Low level archaeology is anticipated
- **Kent Wildlife Trust** No objections

West Kingsdown Industrial Estate

- **KCC Highways.** There are no highway objections to this proposed allocation
- **West Kingsdown Parish Council** Are happy with the proposal being made.

Broom Hill Swanley

Local Residents Comments

- It has been proved on several previous planning applications that Beechenlea Lane cannot take any more traffic
- Extra pollution will be caused by the increased traffic
- Beechenlea Lane cannot take increased traffic. It is a used during holdups on the M25 and at rush hour as a rat run
- 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
- 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
- The local road infrastructure is inadequate to support the additional traffic caused by the development
- The 1996 report stated "Residential/Employment" not require for Exception Circumstances What has changed?
- There are enough brown sites and other land which is not Green Belt available for this purpose.
- There are alternatives to the land at Broom Hill – Pedham Place farm. There are existing warehouses and office spaces in Swanley lying vacant and ‘to let’
- 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
- 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
- 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 Public Enquiry

- 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
- 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
- Proposed entrance is far too narrow to be safe it will become a "danger point" for traffic up and down Beechenlea lane
- 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 consideration
- **KCC Highways** In principle, the site would be suitable for a mixed development of employment served from London Road plus residential development served from Beechenlea Lane and additional open space. However, the question of what level of employment use could be supported by London Road can only properly be answered by modelling the traffic flows at the proposed junction with London Road and beyond as necessary. Whether the best means of access from London Road would be a roundabout or a signal-controlled junction would also be best determined by modelling. A signalised junction would be likely to provide more control of the junction to reduce congestion, and would probably require less land
Due to the proximity of the M25 and the M20, the Highways Agency should also be consulted about the employment aspect of this proposal
There appears to be scope to accommodate the 2 small housing sites accessed from 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
Consideration may also need to be given to the additional vehicle movements at the junction of Beechenlea Lane and London Road and potential mitigation measures at this location to accommodate these additional movements - although it is difficult to assess the potential impact without knowing the existing level of movement at this junction which may already be quite high due to the Lane forming a through-route to Swanley Village. 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
Public transport links and accessibility are reasonable with bus stops close by on the London Road as previously discussed and the sites being within an approximate 10 minute walking distance of the town centre and train station
The accesses to the sites from Beechenlea Lane are likely to require adoption and will therefore need to be to an adoptable standard
- **Moat Housing Group** Do not deem this site appropriate for residential development
- **Swanley Town Council** Strongly objects to the proposal to include residential development at the Broom Hill site due to concerns regarding
 - 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
 The Town Council requests that the site be considered to be returned to the Green Belt or adopted as open space. The Town Council is also concerned regarding the consultation process especially as not all residents within the neighbouring road were contacted regarding this consultation

- **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
- **Environment Agency** 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
- **Highways Agency** The addition of housing to the Broom Hill site further exacerbates our concerns regarding the site's traffic impact on M25 Junction 3
- **Kent Wildlife Trust** Wish to see some guidelines within the policy regarding the level and location of open space and biodiversity mitigation and enhancement
- **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
- **KCC** There is general prehistoric and medieval potential associated with nearby finds. Low level archaeology is anticipated
- **Site Owner** 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
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
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
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

Other issues

Additional sites

- Land Adjacent Dawson Drive / College Road, Hextable, Swanley, Kent
- Warren Court, Halstead should be considered in the same way as Warrant 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. This would be in accordance with the NPPF
- Seven Acres, Crockenhill, Swanley
 - The strong tree boundary separates the housing on Seven Acres from the open countryside to the east
 - 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

- 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
 - 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
 - The site is entirely suitable to accommodate small scale residential development.
 - A minor adjustment should be made to the Green Belt boundary to exclude the site identified on the enclosed plan
- 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
 - 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
- Land at Greatness Park Cemetery, Seal Road, Sevenoaks (Sevenoaks Town Council)
 - Sevenoaks Town Council reiterates representations seeking the removal of a section of Greatness Cemetery's frontage from the Metropolitan Green Belt.
 - 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.
 - The fact that the site in use as a Cemetery has no bearing on its continued inclusion within the Green Belt; and in fact strengthens the case for its removal. Sevenoaks Town Council highlights Greatness Cemetery's inclusion (in its entirety) within the September 2011 Draft Open Spaces Allocation SPD (GI 218) as a Cemetery; paragraph 23 explicitly states that sites within the Green Belt should not be afforded additional protection; thus the Town Council's requested modification to the Green Belt boundary should be considered in line with current SDC planning policy.

General Comments

- **Environmental 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
- **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
- **Natural England** 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
This could be made explicit in the Site Allocations document, helping to ensure the borough's green infrastructure is designed to deliver multiple functions
Open spaces and public realm should seek to incorporate "soft" landscaping and green infrastructure, where appropriate, as part of a sustainable approach to development.

In some cases the development of sites and the operation of policies can have limited impact on the natural environment, particularly in respect of matters of landscape, habitats/biodiversity and access

- **Thames Water Property** It will be essential to ensure that the 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. It is recommended that the following paragraphs should be added to the Allocations and Development Management DPD