



Crockenhill Parish Council

Crockenhill Parish Council's Response to Sevenoaks District Council's Local Plan 2040 Regulation 18 Consultation, January 2024

Policy ST1 – A balanced strategy for growth

Crockenhill Parish Council is broadly supportive of Sevenoaks District Council's Draft Local Plan 2040 in terms of its strategic priorities which include addressing climate change, promoting healthy communities and building homes to meet local need. However, we question whether these are genuine priorities as they have not been given proper consideration in relation to some of the proposed development sites put forward as part of this latest consultation.

We also recognise the challenges faced by Sevenoaks District Council (SDC) in developing a Local Plan which responds to national housing targets in a District which is 93% Green Belt and 60% AONB but given the fact that this consultation focusses on the use of Green Belt and AONB in order to meet housing targets, it is our view that the very basis of the Local Plan is unsound. Furthermore, as a robust impact assessment has yet to be carried out on the Pedham Place proposal, and with uncertainty around proposed infrastructure provision, it is again our view that the Local Plan does not meet the 'soundness' test. We have noted similar issues with Bedford Borough Council's Local Plan and the Inspector's subsequent conclusion.

It is also our strongly held view that with the removal of mandatory national government housing targets, a version of the plan which protects the Green Belt and AONB would be sufficient to meet local need. We believe that if mandatory targets were imposed in the future, SDC has an exceptionally strong case for negotiating lower targets based on the fact that such a high percentage of the District is designated as Green Belt and AONB. Other District/Borough Councils have successfully achieved this. It is unclear why SDC is continuing to aim for the highest possible housing targets. We also believe that the changes to the National Planning Policy Framework (NPPF), updated December 2023 have already outdated this Plan and SDC needs to reflect on the changes and revise its Local Plan accordingly. It is also unclear why SDC is not focusing on working with local Parish and Town Councils and landowners in identifying suitable brownfield sites for possible development.

It is important to note that Crockenhill Parish Council is not opposed to development per se. The Parish Council is supportive of the building of homes in appropriate areas where there is local need and where the existing infrastructure is in place or where there are clear and detailed plans for improving local infrastructure. We welcomed the opportunity to work with Action with Communities in Rural Kent on the updated Local Housing Survey for Crockenhill and Well Hill (May 2021) to ascertain what the actual local need is rather than arbitrary generated targets. We do however need to ensure that the Green Belt is protected, that the views of the Parish Councils are taken seriously and that the new Local Plan covers all the issues which we have identified as causing problems when it comes to determining planning applications in rural areas.

The proposals for Pedham Place in particular, are in our view, unfeasible and the effects such a large-scale development would have on this part of the country are far-reaching and potentially devastating for the local towns and villages. We must not lose sight of the role of the Green Belt – the aims of which include preventing neighbouring towns from merging into one another and assisting in safeguarding the countryside from encroachment. The Pedham Place proposals are completely at



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odds with the very definition of Green Belt status and combined with the other development options which are being explored, will effectively result in the merger of the rural villages of Crockenhill, Eynsford and Farningham – thus resulting in them losing their individual character and identity.

For all the reasons stated above, of the various development proposals, Crockenhill Parish Council would select **Option 4** (none of the above) – or baseline sites only if this were an option.

MX15 – Pedham Place

The public outcry in response to this proposal speaks volumes. Concerns raised are largely centred around infrastructure and irreversible damage to surrounding villages and the local landscape. We share all of these concerns and will outline our arguments below. However, there are also some key points around the actual methodology/terminology used that we feel are extremely important and we would question whether the Local Plan therefore meets the 'soundness' test:

- The site of the proposal Pedham Place development is misrepresented throughout the Local Plan. It is referenced as Swanley, when in fact it sits within the parishes of Eynsford and Farningham. SDC is using this as part of their justification criteria for using Green Belt land and AONB land – stating that it is close to the 'existing settlement' of Swanley.
- The absence of a feasibility study makes the plan unsound. We do not feel that full consideration has been given to the impact of this development on existing local infrastructure, services and facilities, including the road network, public transport, GP surgeries, hospitals and schools, the character and appearance of the area, flood risk, sewage capacity, biodiversity, air and light pollution and highway safety.
- In the consultation, it does not state that option 2 (Pedham Place) is Green Belt and AONB. Many residents looking at the options would therefore assume that as the other options specifically state Green Belt and AONB and this one does not, that option 2 is the only one that protects the Green Belt. The consultation process is therefore completely flawed and we can assume that the results will not accurately represent residents' views.
- According to SDC's own 2023 Green Belt Assessment, the site falls within strongly performing Green Belt and it was not recommended for further consideration. However, we also noted that the site's promoters have commissioned their own assessment and the site subsequently sub-divided into smaller plots by consultants and this particular site plot was deemed to be not performing as strongly. This seems rather convenient and does not appear compatible with the purpose of the Green Belt and the very spirit in which it was originally created ie to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment and to preserve the setting and special character of historic towns. This approach of sub-dividing plots and re-evaluating them potentially opens the floodgates for local authorities and developers to build wherever they wish.
- The three options being presented, which all require building on Green Belt and AONB, is not giving residents a clear opportunity to object to this approach. The consultation does not make it clear that there is an option 4 – none of the above. The result of this is that local areas feel



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they have been forced down a path of voting for the 'least objectionable' in terms of their local areas – effectively pitting areas against each other.

The potential impact on our local towns and villages with this proposal will be devastating and irreversible. From this perspective, any future impact assessments carried out should be sensitive to all aspects of our community and include impacts on local farming husbandry activities and village cultural characteristics which have been developed over many centuries. These aspects are integral to our community and as such should be protected as a priority. Many of our older residents remember Crockenhill and Swanley as being farming communities with many acres of greenhouses and active farmland. There were multiple hospitals that were situated locally, some of which were for patients to convalesce away from London's smogs. Whilst change is inevitable and houses need to be built, we feel that the proposals on this size and scale will change the very character and identity of this area.

SDC's justification for building on the Green Belt and AONB is that the proposals meet the exceptional circumstances test and argue that the development is in the public interest. We are strongly opposed to their exceptional circumstances justification for the reasons outlined below:

1) The Green Belt and AONB plays a vital role at this location

We feel strongly that the Green Belt and AONB status should continue to be protected at all costs.

As explained in our response to policy ST1, we must not lose sight of the role of the Green Belt – the aims of which include preventing neighbouring towns from merging into one another and to assist in safeguarding the countryside from encroachment. The Pedham Place proposals are completely at odds with the very definition of Green Belt status and will effectively result in the merger of the rural villages of Crockenhill, Eynsford and Farningham – thus resulting in them losing their individual character and identity. Such is the scale of this development. SDC's own Green Belt assessment deems this area strongly performing.

We must also remind ourselves the importance of this particular site in terms of its AONB status: It provides a buffer zone to protect the Darent Valley. Its position on top of the hill means that the development will be visible for miles, particularly when lit at night. The M25 is not lit at this section specifically because the Inspector agreed that lighting would adversely affect the AONB.

Add to all this the international priority of addressing the challenges posed by climate change, the continued protection of our Green Belt and AONB is more important than ever.

2) Not in the public interest - the road network will not cope

Full consideration has not been given to existing infrastructure, especially taking in to account the impact of the new Lidl supermarket at the Broomhill site, near junction 3 of the M25, and for a Millwall football complex in West Kingsdown. The combined impact of these developments on the traffic has yet to be felt – and to add more to J3 from Pedham Place is unimaginable. As yet, no full impact assessment has been carried out to evaluate the combined impact of extra traffic generated by all the above.

Crockenhill Parish Council
Village Hall
Stones Cross Road, Crockenhill, Swanley, BR8 8LT
Tel: 01322 614 674
Email: clerk@crockenhillpc.org.uk



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Extra traffic generated will have an adverse effect on;

- a) M25 congestion
- b) Country lanes
- c) Swanley town centre
- d) Main routes

M25 congestion

- The M25 is regularly at a standstill at the Swanley junction (3) and the issues that this junction experiences on a daily basis are well documented.
- When there are accidents or other hold-ups anywhere south of the Dartford Crossing, or congestion at the Dartford Crossing the Swanley intersection is grid-locked. Traffic then tries to find alternative routes through Swanley or local lanes to avoid the jams. This has an adverse knock-on effect on the local road network.
- Gridlock on the M25/M20 intersection also occurs when there are highway incidents to the south at the junction of the M25 with the M26.
- When there is an event at the international motorsports venue of Brands Hatch (at West Kingsdown on the A20 about 3½ miles to the east of the site) all major and local roads are congested.
- If car journeys generated by another 2,500 households, lorry/van movements servicing the new manufacturing hubs/shops and the travel associated with the proposed new schools were added, plus the 28,000 visitors to the stadium, traffic is likely to come to a standstill for everyone. Even with major highway alterations, traffic problems would not be solved, but merely displaced. In any case it is unlikely that new highway projects could be carried out in the time frame envisaged. Their initiation lies outside the remit of both the District and County Councils.
- The proposal to add a lane to all routes around the roundabout is in our view unfeasible, because of the bottlenecks which will occur as the traffic from these extra lanes will have to merge with the local road network. The proposals also completely fail to acknowledge the environmental impact of this – both in terms of air quality (London Road B2172 is within an air quality management area) and light pollution, neither do they take into account traffic generated by the stadium should that proceed.

Country lanes - Eynsford Road, Crockenhill Lane, Wested Lane

- When there are traffic jams through Swanley and on the M25 (daily occurrences) there is a tendency to use the B258 and its feeder lanes (Crockenhill Lane, Wested Lane, Eynsford Road to the east) as rat-runs. With hundreds of new housing units and a 28,000 seat stadium proposed, the situation will become untenable.
- In recognition of the traffic problems already faced by Crockenhill, KCC implemented a 20mph zone through the village. This is still not enough and the Parish Council is continuing to work

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with KCC in identifying further potential traffic calming measures. Work has been ongoing for decades, with still no suitable solutions found.

- It is noted that proposals include widening Wested Lane and installing traffic lights by the Railway bridge, which has a weight restriction. The congestion caused by the traffic lights would further add to any issues experienced along the B2173. They have proposed to provide a bus service to take commuters from the new housing development to Swanley railway Station avoiding the M25 J3 roundabout. This does not take in to account the proposed stadium complex.
- The new roundabout for Lidl at the point where traffic from J3 is trying to merge into a single lane, is bound to cause congestion, and drivers will seek a way round by turning off into Wested Lane. The congestion caused by the traffic lights at the bridge would further add to the issues experienced in Crockenhill, Swanley and surrounding areas.
- If carried out this would draw even more 'rat-run' traffic through the village of Crockenhill which would worsen the traffic issues outlined above, due to the nature of country lanes. When the line of traffic created by the traffic lights meets traffic on Eynsford Road coming in the opposite direction traffic will come to a standstill- bearing in mind that in places the road is barely two cars' width, with few passing places and with sections not wide enough for vans to pass, let alone large vehicles.

The proposal fails to recognise:-

- Eynsford Road is an ancient sunken lane with farmland several metres above the road, which is lined by chalk banks as it descends to the village. To widen the road along this section would be more complex than is implied. Banks would need to be stabilised and probably inclined, taking away valuable farmland (Grade 2 - Very Good: Agricultural Land Classification - London & South-East (ALC007)).
- Even if the lanes were widened there would be **no way to make improvements where the route enters and proceeds through Crockenhill**. More traffic being enabled to negotiate the approach lanes would have the knock-on effect of causing chaos and preventing free flow of traffic in the village.
- It would be impossible to widen the road once it enters the village (from whichever entrance), because it is mainly built up on both sides, and two burial grounds and church edge the rest.
- Eynsford Road leading to Main Road in the centre of the village is effectively single lane, because residents' cars are parked outside their terraced houses as there is no alternative parking, and none found when the issue was explored by the Parish Council.
- In the village this route has 2 junctions (Church Road and Westview) with traffic leading blindly into Eynsford Road.
- CPC is concerned about highway safety in the village if more traffic is generated. Eynsford Road only has a pavement on the north side, and Church Road only on the west side. All pavements are narrow and sometimes obstructed by cars parked on them to make the road wider for vehicles. Many pedestrians cross Eynsford Road/ Main Road because the bulk of

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housing lies to the south. However, the shops, school, and village hall lie to the north. It also serves All Souls' Church and the Baptist Church. Access to these facilities makes crossing Eynsford/ Main Road essential. Any more traffic would endanger pedestrians, especially the elderly, whose movements and reactions are generally slower, and school children (the crossing patrol having been withdrawn and KCC has been unable to find alternatives).

- The loss of ancient hedgerows would further detrimentally alter the character of the route and landscape from the village to the M25. Crockenhill Tree Survey (2011-2012) shows there to be 8-9 species of hedgerow trees along Wested Lane, and 14 on Eynsford Road above Gosenhill Farm, including ancient indicator species such as spindle, wayfaring tree and whitebeam.
- Sevenoaks Landscape Character Assessment highlights Crockenhill's 'Settled Farmland Landscape', and recommends that 'the existing characteristics of rural lanes including tall hedgerows and small spinneys be retained' and that 'urban roads respect the existing rural landscape character'. The proposals run counter to these recommendations.
- CPC does not believe that proposed 'improvements' would alleviate the traffic problems in the lanes generated by any development at Pedham Place, rather it would cause more traffic and create more highway safety problems off site, and particularly in Crockenhill, which is in the front line for movements into the London boroughs.

B roads - B2173 through Swanley to B258 to Crockenhill and beyond

The impact of possible development of the scale of Pedham Place will adversely affect the volume and flow of traffic on the B roads, which are already under pressure:-

- When there are traffic jams through Swanley and on the M25 (regular occurrences) there is a tendency for drivers either to rat-run along the B258 or Wested Lane/ Eynsford Road leading into main road. This means that more traffic from two directions converges onto the centre of Crockenhill.
- The B258 to Crockenhill leaves Swanley B2173 at a roundabout just south of Swanley centre. This intersection causes a bottle-neck resulting in traffic tailing back not only on the B2173, but also on the B258. Congestion and delays, with traffic idling in an AQMA zone, exacerbate an already unhealthy environment, and is particularly bad during rush hours and school run times. The added impact of the Broomhill site is yet to be felt. We also feel that the proposed new roundabout on the B2173 would in fact cause further congestion, again encouraging more vehicles to cut through Wested Lane and the village. In the village this route has a junction with Old Chapel Road (adjacent to the Chequers public house) with traffic leading blindly into Cray Road.
- The whole route through from Swanley to St Mary Cray is single lane in both directions and single-decker buses, and vehicles of similar width, have difficulty in passing. Particularly narrow is the section along the approach to Kevington from Crockenhill. Improvements along Cray Road would be dependent on the London Borough of Bromley and outside Sevenoaks DC's control.



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3) Not in the public interest - Pressure on over-stretched local services and infrastructure

The Pedham Place plans include proposals for new schools, health facilities and improvements to the road network – but with no firm details in terms of delivery dates or guarantees that any of it will actually happen. All of these things are outside the control of Sevenoaks District Council and are dependent on many other agencies and privately owned companies delivering what is needed. In the absence of any legally binding agreements with developers, National Highways, Kent County Council, water and electricity suppliers etc it is merely a high level 'wish list'.

Crockenhill already experiences issues with the road network and traffic, as documented above but it is also impacted by the recent merging of the Doctors surgeries which has resulted in no choice for local people and longer waiting times. Our local hospitals are already struggling to cope. Pressure on secondary school places has also increased over the past few years, due to the already significant growth in North Kent. It is easy to promise new schools and health facilities, it is another matter entirely ensuring that these are delivered.

The Darent River Preservation Society reported (DRIPS Report, Autumn 2019) that the proposed new housing development would put unsustainable pressure on the local water supply. The aquifers which draw on the river Darent are getting low and would run out within the next 20 years. Options to improve the situation could include reducing housing targets, desalination of sea water or piping in water from reservoirs, but such solutions are many years away and require government action.

Thames Water and the Environment Agency are aware of the situation, and Crockenhill Parish Council hopes that the Inspector would request that Thames Water responds to these concerns, if it has not already done so.

4) Not in the public interest – The transport provisions are woefully inadequate

Swanley station has insufficient parking for current commuters. Farningham Rd station has only an hourly service, and there are no proposals to increase this. Experience shows that many commuters will drive to St Mary Cray / Orpington (dependent upon London destination) to benefit from being in the Travelcard Zones. This would increase traffic through Crockenhill and the surrounding lanes.

The proposed bus service appears to be no more than wishful thinking on the part of the developer. There is no operator proposed for this.

With specific reference to both the stadium options, there are no reasonable "non road" means of serving this. Swanley Station is singularly unsuitable for handling large crowds, and would require very specific arrangements requiring extra staff and operating restrictions that would impact other services. The other options would be Farningham Rd station or Eynsford. Both would require connecting bus services (as would Swanley), and impose considerable cost on the Train Operating Company which are unlikely to meet the requirements of a cost / benefit analysis.



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5) Not in the public interest – Air quality already poor

Air quality in this area around the M25/M20/A20/J3 is already amongst the most polluted nationally and fails requirements for acceptable air quality. The effects of the new developments on the B2173 and on surrounding areas has not even been felt yet, but we would expect to see further negative effects on air quality. To then consider adding even more development to this area – and on such a huge scale - is not taking into consideration the health and wellbeing of local residents at all.

Site at Petham Court - Proposal for Wasps Stadium

Although not specifically part of this consultation, we have been made aware of a new proposal for the location of the Wasps stadium to be sited at Petham Court. The first we heard about this latest proposal was at a Local Plan pop-in session. It is hugely disappointing that the Parish Council was not approached directly about this, considering the proposed site is in Crockenhill.

Crockenhill Parish Council is **vehemently opposed** to a stadium being built on the edge of the village.

According to the 2023 Sevenoaks Green Belt Assessment, this particular site is deemed 'strongly performing' – scoring highly on the Green Belt criteria. It also provides a narrow 4-5 mile band of Green Belt from Greater London (St Mary Cray) to M25 which needs to be maintained.

Aside from our objections to building on Green Belt and AONB due to the irreversible damage that would be caused to our open countryside and the rural setting of Crockenhill, it is also a fact that the surrounding country roads and local infrastructure simply cannot support a development of this scale. See our response to MX15 and Policy ST1.

The proposals do not mention the extent of land-take required, and the location near J3 of the M25 is mentioned as a means of visitors accessing the site. The expected capacity is bound to draw a considerable number of cars, yet car parking is not mentioned and would need to be accommodated - potentially requiring much more land than the complex itself.

Policy H1 Housing Mix

We are broadly supportive of the commitment to deliver all new homes to meet the M4(2) criteria. We would however question whether the 5% target for M4(2) is sufficient, given the previously stated aging population figure of 26% of total population by 2040.

Policy H2 Affordable Housing

Again, we are broadly supportive of the policy but have reservations whether it is workable. We recognise that Sevenoaks is particularly vulnerable to the argument that affordable housing provision is not as viable for Developers because average house prices are so high. This is the area of housing most needed in Sevenoaks.



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We have enforcement concerns based on previous experiences where Developers have not delivered on their commitments, and with little or no consequence.

Policy H3 Housing in Rural Areas

We would like to see more emphasis on the District Council working more closely with Parish and Town Councils, both in terms of identifying potential areas for small-scale, appropriate development and in determining planning applications more generally. The Local Housing Surveys have been carried out but what is the next step? There does not appear to be a process in place for Parish/Town Councils and the District Councils to work together on this and yet this would be the most effective strategy. No-one understands local public opinion and infrastructure-needs more than the Parish Councils, so there is an opportunity wasted here.

Policy H4 Housing for Older People

We are broadly supportive of the policy but we would like to see more specific building criteria. In our experience working with older people in our own village, it is clear that existing social housing is not suitable. For example, many older people require suitable housing with their partners and much accommodation is only suitable for single people – eg no space for a double bed. In our Housing Survey lack of storage was also identified as a need. Gardens are not a priority due to maintenance and there is a preference for smaller courtyards with space for a table and chairs and drying of clothes. We need to move away from the position of people having to move out of the area to find appropriate accommodation.

Policy SL1 – Sports and Leisure Facilities

Whilst on the face of it, the ambition of creating a world-class ‘cluster’ of sporting facilities in the north of the District sounds like a positive step, the reality again is that we do not have the infrastructure to support large-scale sports stadiums. Furthermore, by stating this ambition in the Local Plan (and as a policy), our concern is that developers will see an opportunity to put forward other Green Belt/AONB sites as potential locations for sporting facilities, regardless of real need. We also note that there is no evidence within the Plan 2040 evidence-based documents to support the claim that there is demand for a cluster of world class facilities to be built. The inclusion of this policy will make it more difficult for SDC to object to proposals. It is our view that this particular policy has the potential to have the most far-reaching consequences for the District, and the criteria SDC have stated that need to be met in order for SDC to support any new large scale sporting facilities are weak.

No proper impact assessment has been carried out or consideration given to the amount of land that would be required just to provide access and parking for these ‘new large-scale sporting facilities’. The existing Brands Hatch site has a huge impact on local roads on track/event days. Add to this the plans for a new Millwall training ground at West Kingsdown, a stadium at Pedham or Petham Court and it is impossible to see how the local road network will cope. In addition, the floodgates will be opened for developers to put forward more sites ‘north of the District’.

We object to this policy for all the same reasons stated in ST1 and MX15 – particularly around infrastructure and the road network pressure. The sheer scale of such developments would have a hugely detrimental effect on the openness of the countryside, loss of Green Belt and AONB, and would dwarf neighbouring settlements.



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Policy EMP5 Rural Economy

Buses/public transport MUST be prioritised. This would also help the Council achieve its NET Zero objectives. Villages like ours, with an aging population, are particularly reliant on a good public transport network and recent issues with bus operators and threats of further cuts to rural services have meant that many of our residents are particularly vulnerable to becoming completely isolated.

Again, delivery is in question because KCC subsidise some routes and, faced with severe financial problems, are not able to provide bus companies with the money required to run unprofitable routes.

Closer consultation with Parish Councils and their residents and business owners is essential.

More general comments:

'Brownfield' definition

In particular, we would like to see SDC's local definition of '**brownfield**' revised. It is an ambiguous term and we have seen how developers have used this to their advantage and residents' disadvantage. It is not clear why SDC have chosen not to adopt the NPPF (National Planning Policy Framework) definition. Also, if someone has developed land without permission, it should not now fall under the Council's definition of brownfield.

Barns/Outbuildings

In more general terms, we have also noted the increasing number of barns/outbuildings being converted to homes and for business use. This is a concern in the rural areas as businesses in particular generate traffic that the country roads not designed and are ill-equipped for. We have also noted the number applications for barns/agricultural building/ stables across the District. There is opportunity for these buildings to be later converted to residential dwellings and this needs to be properly addressed.

Property being marketed as potential for development

We have noticed that this is becoming an issue across the District, with property/land within the Green Belt. The District Council needs to address this and find away of working with local Estate Agents to ensure that properties are not inappropriately/falsey marketed.

Air Quality

Alarminglly, the London Road B2173 and the M25 and A20 corridors already fall within the Air Quality Management Area (AQMA) (SDC Sevenoaks_ASR_2019_Final_%20(1).pdf pg56). Given that it is one of the biggest risks to public health, we would like to see specific targets for improving air quality across the District.