



# PARISH COUNCIL OF EYNSFORD

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## **Eynsford Parish Council Response to Draft Local Plan 2018**

The following comments represent the formal response from Eynsford Parish Council on the Sevenoaks District Council Local Plan, Regulation 19 Consultation, December 2018, with specific reference to entry ST2-28 – Land at Pedham Place.

Eynsford Parish Council responded to the previous consultation, however, the Council believes that Sevenoaks District Council (SDC) has failed to respond the points raised and have included the Pedham Place developments in the Local Plan against the available evidence and without sufficient supporting evidence.

### **Response to proposed Pedham Place Development ST2-28**

The following comments represent the formal response from Eynsford Parish Council on the draft Local Plan, specific to site ST2-28 – Land at Pedham Place.

The site lies within the Green Belt and AONB. The proposal is for changes to Green Belt boundaries enabling a mixed use development including 2,500 houses, leisure, education and health facilities. The NPPF paragraph 136 states ‘Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.’

In order to gain inclusion in this new Local Plan as an exception site the developers must demonstrate ‘exceptional circumstances’ that are fully evidenced as a benefit to the existing community.

### Location and the AONB

The site sits wholly within the Sevenoaks parishes of Farningham and to a lesser degree Eynsford. SDC have cynically tried to link the site to Swanley by listing it under ‘Swanley’ on page 34 of the plan, rather than with the other Farningham sites under ‘Other Settlements’ on page 37 of the plan. The local or existing community and owning parish is Farningham and this must be considered when judging whether any benefit will accrue to the existing community.

The proposed development would occupy land wholly within the Kent Downs AONB. According to NPPF the AONB should be afforded the ‘highest status of protection’ in relation to landscape and scenic beauty, alongside that of our National Parks. The NPPF also states, ‘The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.’ Any evidence supporting an exception

site must meet a very high bar when considering if a development is appropriate in the AONB. On this basis, the proposed development should be ranked below other non-AONB sites in order of preference for development.

The current adopted Core Strategy paragraph 4.3.5 states, 'Swanley is surrounded by Green Belt land. Land to the south east is also within the AONB which should be safeguarded from encroachment'. SDC themselves describe the site as 'strongly performing Green Belt and AONB', but goes on to identify it as a 'broad location for growth'. These statements are not compatible.

The Draft Local Plan states on page 13, 'the two Areas of Outstanding Natural Beauty will continue to be conserved and enhanced in a way which protects local identity and distinctiveness.' The proposed development would fail to protect the AONB from encroachment of development.

In the previous consultation, Kent Downs AONB has put forward a robust and compelling case for rejecting the Pedham site. This should lend significant weight to the argument against this site and sets a very high bar for evidence to support any development of Pedham Place.

The site has previously been used for land-fill from a number of infrastructure projects in the south east. Although there is documentary evidence from the time of the land-fill that no contaminated waste was delivered to site, this should not be taken at face-value and a full evaluation made for sub-surface contaminants. To date, the developer has provided no evidence that this has been done and has not offered any proposal to conduct any such assessments.

The location at Pedham Place would provide poor amenity and unacceptable noise and pollution levels for potential residents due to its proximity to M25/M20/A20 – Page 88 Residential Amenity and Noise statement in the Draft Local Plan states, "avoid areas where occupiers of the development would be subject to, excessive noise, vibration, odour, air pollution". Policy 18 also states, 'New development in areas of poor air quality will be required to incorporate measures in the design and orientation that demonstrate an acceptable environment will be created for future occupiers. Schemes where unacceptable impacts cannot be overcome by mitigation will be refused'. The location of the development near the industrial sites at Pedham Place and the Teardrop refuse centre would also provide poor amenity to potential residents.

A housing development at this location would extend the urban environment that currently borders on the western side of the M25. It would encroach significantly into the Darent Valley, Green Belt and AONB creating a significant risk of future 'development creep' towards the existing settlement of Farningham and to a lesser extent Eynsford. The M25 forms a barrier that currently defines the protected areas and should remain as the furthest extent of major urban development.

The developer has failed to provide sufficient evidence that the benefits of the development outweigh the level of protection prescribed in the NPPF. They have failed to demonstrate the development is 'in the public interest' and have proposed no schemes or solutions to mitigate the impact of noise and pollution on the site. Therefore, the proposal should be excluded from the new Local Plan.

## Transport

The developer must demonstrate a clear and sustainable strategy for transport infrastructure improvements to significantly reduce the impact of the development on the surrounding area.

To put this into context, the Swanley Transport Study lists the B2173 east of Swanley as the most congested route into Swanley town. The Swanley Transport Study – Stage 2 states 'The M25, M20 and A20 accommodate high volumes of traffic through the whole day and are known to experience

congestion at peak times, particularly the M25 northbound towards the Dartford Crossing. Similarly, there are relatively high volumes of traffic entering and exiting Swanley Town Centre on the B2173 and B258. As a result, reduced link speeds, increased vehicular delays, poor journey time reliability and reduced noise and air quality is experienced on the main vehicular routes through the study area.' Add to all this, a general increase in traffic of between 15% and 21% over the plan period, the impact will be severe.

The only proposed vehicle access points are onto the A20, at the roundabout with the Teardrop Refuse Centre and near the junction with Button Street. These access points would be within a few hundred metres of each other on the same road. This fails to provide alternative access routes with all traffic from the site merging onto the same section of road. This section of the A20 is a busy dual lane road with a poor history of road safety. We believe the extra road traffic from the site would pose an unacceptable burden on the already congested A20 and the area around the M25 junction 3. Specifically, the roundabout for the Teardrop Centre at peak time suffers from queuing traffic which would be exacerbated by traffic from the development. With the A20 from the M25 the major route into Brands Hatch this could add to traffic flow problems around the access points to the new development.

The proposed development includes leisure, health and education plans, which would by necessity, draw in people from the wider area, particularly Swanley. This would place additional traffic burden on the area and unacceptable risk for cyclists and pedestrians particularly at the M25 J3 roundabout. The provision of leisure facilities scaled/ designed to serve the wider community outside of the development, and in order to justify the 'exceptional circumstances' test, would pose an unacceptable burden on the existing road network. The provision of educational services aimed at the wider community outside of the development and also in order to justify the 'exceptional circumstances' test would pose a significant burden on the existing transport network and pose unacceptable risk to school attendees using the B2173 and the M25 J3 roundabout.

The proposed plan includes a number of developments on or close to the congested B2173, Bus Garage and Kingdom Hall with 74 units being an example. These will add significantly to this congested artery into and out of Swanley town. Pedham Place should not be allowed to add to this.

Eynsford straddles the A225 which links the north of the area to the main settlements and services at Otford and Sevenoaks. The A225 is already heavily used by both cars and commercial vehicles, the levels of traffic is already at unacceptable levels particularly through the tight and twisting village stretch of the road. The development will only serve to increase the level of traffic through the village having an adverse effect on the amenity and safety of village residents. The Anthony Roper Primary School also sits on the A225 and again would be affected by any additional traffic adding to the safety concerns of school children.

The transport plan includes a 'Park and Ride' scheme for transport to Swanley Station. There is no evidence of a local requirement for such a scheme and no detail on how such a scheme would be funded or maintained over the long term. There are no existing, planned or proposed 'fast track' routes into Swanley town or the station forcing the buses down the same already congested routes including the B2173. This would mean buses having to contend with the other traffic, offering no incentive for commuters or shoppers to use such a service, in short it is unsustainable.

Historically, there have been two applications for development on or adjacent to the Pedham site; an application for motorway services, and parking for the Millennium Dome. Both schemes were ultimately refused with the adverse impact of traffic being a major issue for both applications. In the 18 years since the last of those applications, the volume of traffic has increased significantly.

In recent months, rail services to and from Eynsford have been reduced in order to free capacity for commuters from further afield. Car parking at Eynsford station is already at capacity with local residents suffering spill-over parking in the narrow local roads. There is no capacity for additional commuter traffic at Eynsford station. Similarly, Swanley station is at capacity in terms of both rail services and commuter parking. Encouraging additional commuter traffic along the congested route between Pedham Place and Swanley station would cause additional disruption to local traffic movements and increase pressure on limited parking capacity in Swanley.

To address the significant transport problems this development would generate requires a bold and wide-ranging transport strategy that goes far beyond the inclusion of unsustainable park and ride schemes, new traffic signals and adjusted junction priorities. The developers have failed to provide evidence of a sustainable integrated transport strategy that sufficiently mitigates the extra traffic to and from the development and that addresses the safety concerns raised. They have failed to demonstrate any joined up strategy with the strategic transport authorities at county or national level and have yet to negotiate with local transport providers to formulate sustainable solutions. The proposal fails to address the transport requirements for the development itself, and fails to demonstrate any benefit to the existing community. The proposal falls far below the level required to justify 'exceptional circumstances' and should therefore be excluded from the Local Plan.

### Leisure

Included in the proposal is a 'state-of-the-art leisure centre' and although there is no mention specifically of a swimming pool, this has been cited in discussions with the developers. A development of this size, although presenting significant needs for leisure facilities, cannot itself justify the need for a large multi-use leisure centre with pool. We conclude the inclusion of such a facility, is an attempt to add justification to the 'exceptional circumstances' case by offering facilities benefitting the wider community.

Given the existing provision of leisure facilities at Dartford, Sevenoaks and Swanley White Oak this will not provide additional or significant benefit to the local communities of Farningham and Eynsford. There is a suggestion that services from Swanley White Oak could be relocated to Pedham Place. It is not accepted that the relocation of existing services adds any additional benefit to the local communities including Swanley residents. This would clearly be a relocation of existing services and therefore not justification for 'exceptional circumstances'.

The relocation of leisure services to Pedham, away from the majority of users and the local rail station at Swanley would also fail to support a sustainable transport policy. The majority of users would be from the Swanley and Hextable areas, once again having to negotiate the congested B2173 and M25 J3 roundabout. Significant weight should also be given to the following findings from SDC published documents:

- The 'Swanley and Hextable New Vision' report states that from survey data 96% of residents want their leisure facilities retained in Swanley, ergo not relocated away from the town into Farningham.
- According to SDC report 'Open Space, Sport and Leisure Study 2016-2035 Initial Findings', White Oak Leisure Centre has a low used capacity of only 47%. There is no evidence that this is due to age as other more modern facilities in the district have similarly low rates of use. Moving the leisure facilities to Farningham would only exacerbate accessibility problems for Swanley residents and may therefore reduce use further.

- The Draft Local Plan itself states ‘We want to support a range of leisure and recreational facilities to create a vibrant town centre’. It is also stated on page 13 – ‘town centres will be the focus for retail and leisure opportunities.’

Moving the major leisure facilities away from Swanley town centre, is at complete odds this stated vision.

Any attempt to justify the inclusion of new leisure facilities as part of the ‘exceptional circumstances’ case would be against the evidence. This would also take the vital leisure service away from the majority of people it is intended to serve, adding to transport problems for the wider community. There is no evidence to support the need for a leisure centre scaled to support the communities of Swanley and Hextable and based on the information above it is clear that the proposal falls far below the level required to justify ‘exceptional circumstances’ and should therefore be excluded from the Local Plan.

### Health

There is already a well-functioning GP surgery at Farningham serving local residents including Eynsford. The proposal mentions the possibility of ‘integrated health and leisure facilities’ and GP services, but fails to offer any detail of how they will be provided. At this late stage, the developers have only recently made contact with the local Clinical Commissioning Group. Consequently the proposal includes no credible plans for health provision at the site or the wider community. The proposal contains no evidence of an existing need for additional GP services and no health related proposals supporting the case for ‘exceptional circumstances’, it should therefore be excluded from the Local Plan.

### Education

The proposal mentions a primary school at the heart of the development and possibly nursery and special educational needs facilities. The proposal contains no calculation of the actual school places required; given the 2,500 homes planned a single school may be insufficient. This may lead to pupils having to travel outside of the development for their education placing additional burden on local schools such as the Anthony Roper Primary School in Eynsford.

A development of this scale will also generate significant need for secondary school places but the proposal offers no solution for the provision of such services. Without secondary provision pupils will be forced to travel outside of the development through already congested local road network, this is unsustainable. Conversely, the provision of a secondary school within the development would attract pupils from the Swanley and Hextable areas, also unsustainable from a transport perspective.

The development will significantly increase competition for the already limited grammar school places to the north. Being closer to schools in Wilmington and Dartford, pupils from the new development may get preference for places having a negative impact on the existing school age communities of Eynsford and to a lesser extent Farningham.

The proposal fails to present a cohesive educational plan and offers no evidence to support the case for ‘exceptional circumstances’, it should therefore be excluded from the Local Plan.

Supported by all the comments above, Eynsford Parish Council strongly objects to the proposed development ST2-28 and requests that the proposal be removed from the new Local Plan.

17<sup>th</sup> January 2019