



Site MX54A and MX54B – Land between Beechenlea Lane and the Railway Line

STRONGLY OBJECT.

Swanley Town Council objects to all 'options' of this proposal listed on the SDC website in the strongest terms and opposes development on both or either of the pieces of land either side of the railway line for residential or other built development. We reject the spurious 'exceptional circumstances' put forward by the developer, all of which will already be met by various proposals in development by the Town Council and other public authorities and private organisations.

We strongly refute any notion that this development brings needed community or infrastructure benefits to Swanley and on the contrary, the desecration of this land will negatively impact on air quality and traffic levels, as well as setting an unacceptable precedent for the merging of the communities of Swanley Village, Swanley town and Hextable.

We refute the allegations made on the public letters dated 4th and 19th June by 'Pro Vision' on behalf of the Landowner that the unanimous decisions by the town council, and the Planning Advisory Committee and the Cabinet of Sevenoaks District Council did not emphasise at that time the political opposition to development on BOTH of these pieces of land.

We refer Sevenoaks District Council to the Planning Advisory Committee meeting and Cabinet endorsement in 2017, which specifically and unanimously confirmed Town and District Councillors' views on the development of both pieces of the land.

For absolute clarity, it remains the Town Council's view, as was clearly voiced at the PAC meeting in Jan 2017, supported by our District Councillors and the District Council's Cabinet in February 2017, that both pieces of land are not suitable for development. If 'Pro Vision' wishes to try to technically deny the spirit and meaning of the resolution, we would clarify on a map that part of both pieces of land are 'east' of Archer Way, which was the original intention of the proposer, Cllr Michael Horwood. Hundreds of houses are easily considered mass development and therefore we find it objectional that Pro Vision are attempting to re-write the history of these meetings through spurious interpretation of the recommendations and resolutions. Clearly if they were at the meeting as they state, we can only assume they were asleep if they failed to understand the irrefutable sentiment expressed by local Swanley councillors, local residents, and councillors from across the District.



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That said, we appreciate the requirement to consider the exceptional circumstances put forward, and despite the clear rejection of the principle of this land being development over a year ago, the Town Council has nonetheless considered the proposed exceptional circumstances put forward.

However, on consideration, our conclusion remains the same – that the benefits provided do not bring wider community or infrastructure benefits which outweigh the harm and destruction to the Green Belt, and therefore, on behalf of the Swanley community, we reject the inclusion of this proposal in the Local Plan.

We object on a number of grounds, which have expanded on below in two parts: part one for the restrictions on these pieces of land, and part two for the reasons why we thoroughly disagree with the exceptional circumstances put forward.

Part One: Inappropriateness of development on these pieces of land

Green Belt Land and London Sprawl

In Sevenoaks District Council's own independent ARUP Green Belt report, both pieces of land either side of the railway scored highly across all five purposes of the Green Belt, and secured some of the highest points in the entire District as 'strongly performing' Green Belt land.

One of the purposes of the Green Belt is to prevent London sprawl and Swanley shares its immediate border with two London Boroughs. Protecting all Green Belt land within the parish is vital to protecting the wider area and District from London urban sprawl.

Grade 2 prime agricultural land that supports the local economy and supermarkets

Both pieces of land are officially classified as Grade 2 agricultural land, rated as 'very good quality', which is the highest quality of agricultural land that Sevenoaks District has, as well as it being the highest quality in the local area.

The land that is farmed we understand directly supports the local ASDA store and other local stores with its produce, ensuring a low carbon footprint in doing so, whilst also providing valuable local employment on the farmland and at its nearby distribution depot in Dartford Borough.

We strongly support the need for food production that supports the local economy and reject the need to build houses over prime agricultural land.

Protecting of the separate identities of Swanley Village, Swanley town and Hextable

The development of the northern site, even for an access road, is unacceptable in creating the precedent for development in the northern part of the site. A wide access road would undoubtedly lead to a precedent of development, followed by residential infill and expansion, which threatens the separate identity of Swanley Village. In addition, the development of this area also threatens the border with Hextable, and could over time lead to the disintegration of separation between all three communities.



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Swanley Village also contains a highly important and strongly performing conservation area, which reiterates its identity as a separate community to the town. Any development on this land would have an impact on the local conservation area.

In addition, this development with access to the bottom of Highlands Hill would substantially increase the amount of vehicles using Beechenlea Lane and going through Swanley Village at peak rush hour times, when London Road and Swanley Lane become gridlocked. These extra vehicles would place an unacceptable burden on the narrow roads in Swanley Village, which are already congested and suffer high levels of damage to private property and aggressive driving behaviour due to rat running and subsequent gridlock through the village at rush hour.

Congestion on Swanley Roads

Swanley already suffers from large amounts of traffic and higher levels of car ownership due to its surrounding road network of the M25, A20, M20 and nearby A2. The high levels of traffic and congestion of the town are evidenced in the independent Transport Assessment by SWECO as part of the Swanley and Hextable MasterVision.

Traffic is already gridlocked at rush hour and when the Dartford Bridge backs up, rat running occurs throughout the town. The M25 Junction 3 junction is often at capacity due to knock on effects from the M25, A2, M20 or A20.

In addition, the roundabouts off London Road, Swanley Lane and Bartholomew Way are already at capacity (evidenced by the traffic surveys of the U&I development) and would not cope with hundreds of additional vehicles using them, nor would the narrow single vehicle roads in Swanley Village. The mitigation measures proposed for facilitating any potential U&I development would not cover the increased vehicular activity from this development.

Access through other roads

Following the Town Council's withdrawal of its piece of land from the Call For Sites, suitable access can no longer be achieved through Beechenlea Lane, which is incredibly narrow and would be unable to cope with additional traffic, especially if used to rat run to Highlands Hill. Equally, any access through Moutain Hill or Beech Avenue would be unacceptable, as both roads are also narrow residential roads, with parked cars often creating a one lane road, and therefore would not be suitable for additional traffic.

Impact on Air Quality

Swanley already suffers from high levels of air pollution due to its densely populated residential area and nearby motorway roads. Both NOx emissions and CO2 emissions are incredibly high, which affects health, wellbeing and ultimately life expectancy of local residents.



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Both pieces of land either side of the railway line provides a green lung and buffer between the incredibly busy M25 motorway. The emission levels are also exacerbated when the Dartford Bridge/Tunnel backs up, and often brought to a standstill by the Swanley junction.

Due to the existing layout of the town, there is virtually no buffer between the busy A20 and therefore this green belt land remains the only tool available to keep the pollutions level from becoming worse.

Triangular Site off Lullingstone Avenue and Nos 97-135 Archer Way

Although included in the overall proposal and not listed separately, Swanley Town Council also wishes to specifically object to this site's inclusion in the Local Plan for all the reasons listed above.

This site should not be considered any different to the adjacent agricultural fields, and it remains a vital piece of land in the strongly performing Green Belt. We therefore wish to place on the record our objection to this specific piece of land for all the above reasons.

Part 2 – The lack of ‘exceptional circumstances’

Swanley Town Council rejects all the pieces of infrastructure proposed under the exceptional circumstances. This is because all the things proposed are already being met, or the Town Council is supporting other plans to bring these facilities to the town. These plans do not cause the desecration of Green Belt land.

Healthcare Facilities

Swanley Town Council confirms that it is already in discussions with the local medical practice to upgrade its building which The Oaks surgery already sits in. Our intention is to upgrade this facility, paid for out of our own funds through the sale of The Woodlands, a town council owned asset. We therefore refute any attempt to replicate healthcare facilities, which ultimately would not be funded by the CCG in addition to our facility. In addition, the U&I town centre proposal also includes community space which could be used for medical reasons, as vocalised by them at numerous public meetings.

We therefore conclude that the promise of a healthcare facility is unfounded and unsupported by the plans already being progressed by the Town Council and local doctor's surgery. In addition, the size of the building on the plans looks like it could potentially only serve the proposed development, and not bring benefits to the wider community.

Sports Hall

Swanley already boasts the White Oak Leisure Centre which includes leisure space to undertake a range of leisure activities. In addition, The Howard Venue in nearby Hextable boasts a number of leisure activities.



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Swanley Town Council is currently in discussion with the Sevenoaks Suns Basketball Club, which has expressed an interest to develop its own sports facility off Beechenlea Lane. This facility would not only cater for basketball, but we understand the club are considering facilitating space for other sports activities too. This proposal is independent of the Site MX54b plans and therefore does not require it to facilitate it.

Swanley already boasts a good number of leisure activities, having grown its number of football clubs for adults and children in recent years, as well as launching a new Rugby Club last year, with a youth club recently launched as well. Swanley Town Council already facilitates the accommodation of the rugby club, athletics clubs and other clubs in Swanley Park, and is proposing to redevelop additional buildings to increase the facilities for sports clubs.

Swanley Town Council also owns the Recreation Ground, which boasts a skate park, football pitches and changing rooms.

Swanley Youth Club on St Mary's Road also uses the sports facilities of St Mary's School, again increasing access to sports provision.

We therefore refute that an additional sports hall is needed and that existing leisure provision is already being well catered for in the town, with the potential for an additional sports hall without the need for hundreds of houses in the Green Belt.

Sports Pitch

Swanley Town Council already own enough land to create any required additional pitches, and we are not aware of any additional demand for these. We have put together a 'Sports Forum' for the area, which includes all the local sports groups.

We currently provide football pitches, a rugby pitch, netball courts and tennis courts, all of which are under-utilised, particularly in the evenings, with space for potential additional bookings.

We therefore reject any need for additional sports pitches. In addition despite the comments above, the proposed Sevenoaks Suns Basketball Club includes the creation of a new pitch, which nonetheless negates any perceived requirement by the exceptional circumstances put forward.

Community Centre

Swanley and the surrounding area already offer a number of rooms and venues for the local community and community groups.



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Swanley Town Council hosts the Alexandra Suite, a large venue that can hold several hundred people for events or large celebrations. It also offers smaller rooms and the Clocktower Pavilion for smaller functions that people can hire.

The Link building offers a number of community services, including a community café, Post Office, library, meeting rooms for agencies (West Kent Housing, NHS etc) and other community space.

The U&I proposal also includes a 'community space' aspect that will be decided should the development go ahead.

There is also The Olympic bar, which offers conference and function rooms, as well as a bar and private facilities, and a snooker hall.

In addition there is Five Wents Hall, a village hall style building which can take bookings. In Hextable, there is also The Howard Venue, which can offer larger studios for physical activities and musical/drama performances. St Peter's Church has also nearly completed a huge extension to increase the community space available for the community, including for non-religious groups.

We therefore reject the notion that an additional community centre is needed due to the already high existing provision of community rooms, space and services offered.

Allotments

Swanley Town Council already own a number of allotments throughout the town in Swanley Park and Petham Court Farm.

We reject any notion that additional allotments are needed, and nonetheless the small size of the allotments proposed look like they would only cater for the new development, and not benefit the wider community as a whole. As they are the far side of the development near Beechenlea Lane, it would be unlikely that people from outside the new development would travel to use them.

We therefore do not believe the creation of a few allotments outweigh the harm to the Green Belt, particularly with the ironic building over Grade 2 agricultural land and all the food and vegetables that the pieces of land currently provide.

Downsview School Expansion

As we understand it, Downsview remains undersubscribed, with primary school provision in Swanley already being met by St Mary's CoE Primary, High Firs Primary, St Bartholomew's Catholic Primary, Hextable Primary and Horizon Primary Academy. Several of these schools have already expanded in recent years to create additional provision.



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Birchwood Primary School remains closed by Kent County Council and therefore, were there an undersubscription of primary school places in the area, this could be re-opened.

For secondary school provision, Orchards Academy remains undersubscribed, whilst the Hextable Secondary School (Oasis Academy) was shut down specifically two years ago because there were not enough secondary school places in Swanley and Hextable. If there is a sudden need, these schools could be re-opened without the need to desecrate the Green Belt.

We therefore reject the need for a primary school expansion of Downsview as part of the proposed exceptional circumstances, which would likely serve the new development and have minimal benefit to the wider community.

Park and Ride

Swanley Town Council rejects the need for a park and ride in the proposed location on the plans. It also questions how realistic a park and ride is, especially during rush hour, when London Road is gridlocked and vehicles barely move. There are no fast lanes or bus lanes on the one lane per way road, so there would be absolutely no benefit for people to use such a site or any transport connected to it.

Other comments/observations

Dwellings Per Hectare of the site

We reject the 40DPH figure proposed for the site, which is not reflected in the local housing developments of Archer Way, Dahlia Drive, Hawthorn Park, Five Wents, Swanley Village Road or Beechenlea Lane. Despite all of the above objections, were the site to proceed, we would suggest 30DPH is more appropriate for this site, especially considering it will have no immediate public transport serving it.

HO4 Harrington's Nursery

Despite the joint inclusion in the plan, Swanley Town Council offer no objection to the sole development of Harrington's Nursery, as this is a brownfield site and previously developed land.

We would suggest that any development is sympathetic, non-intrusive and not overbearing to the residents of Five Wents and Hawthorn Park.

In addition, we would also suggest there is a strong need for suitable accommodation for elderly people looking to downsize from Swanley Village, Hextable and Swanley. This would be a good location for a mini retirement development, which is close to all three communities.



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We wish to make it clear, however that we do not support any aspect or plans that include the access road or any residential development outside the curtilage of the nursery, particularly spreading out into the local fields. We also do not support any development that takes place outside the existing built form of the nursery.

Conclusion

In conclusion, Swanley Town Council thoroughly rejects the proposal for any of the pieces of land either side of the railway line to be developed for residential development.

The Town Council is confident that it has dismissed the case for exceptional circumstances, considering that all the proposed infrastructure is already being met, with increased infrastructure already being planned, without the need to desecrate the Green Belt.

We believe both pieces of land either side of the railway are unsuitable for development due to the important Green Belt protections, reinforced by Sevenoaks District Council's own ARUP report, as well as its status as Grade 2 Very Good Quality agricultural land.

We strongly urge Sevenoaks District Council to remove this land from submission as part of the Local Plan. It fails to meet any exceptional circumstances stated, the infrastructure of which is not needed, and fails to receive public support from the local elected representatives or local community.



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