

Swanley Town Council Response to SDC Darft Local Plan

St Mary's Ward

Site MX9 – Upper Hockenden Farm, Hockenden Lane

SUPPORT. Swanley Town Council supports the development of this brownfield site for a mixed employment and residential use. The website does not state the suggested Dwellings Per Hectare; however this should sympathetically reflect a lower number as a development on the periphery of the town, with very limited access to public transport. We would also suggest that a pavement installed on this site to the main London Road, and the road be widened to accommodate the additional traffic.

Site GT5 – Alexis Place, Hockenden Lane

NO OBJECTION. Swanley Town Council does not object to increasing the capacity on this site.

White Oak Ward

Site HO202 – Land Adjacent to 23 Russett Way

NO OBJECTION. Swanley Town Council does not object to the development of this land for some housing; however some amenity land should be retained due to the low amounts of amenity land in this densely populated residential area. We would only suggest a maximum of two properties on this land, with the site contributing to some play equipment for local residents.

Site HO222 – Former Birchwood Primary School

SUPPORT. Swanley Town Council supports the re-development of this brownfield site. However, any re-development should only be considered for the total built area and not into the green belt land or playing fields, which should be kept as amenity land. Any development should respect the privacy and enjoyment of amenity of the houses at the back of Russett Way and Wisteria Gardens, and potentially could include a 'swap' of previously developed and green belt land within the site to allow a more acceptable distance and non-intrusive built form from the houses of 28-56 Russett Way.

Any development could contribute by allowing the retained amenity land to include a much-needed playground for children in this wider area, which would greatly improve the health and wellbeing of families in the local area.

Site HO274 – Land between 16 and 32 Alder Way

NO OBJECTION. Swanley Town Council does not object to the development of this land in order to achieve the District's housing requirements. The existing pedestrian access to Swanley Park must be retained. Parking is a major problem in Alder Way and Northview, and we would suggest any development must provide above and beyond parking requirements, as well as being sympathetic and not overbearing or intrusive to nearby existing properties.

Site MX56 – White Oak Leisure Centre, Hilda May Avenue

NO OBJECTION. Swanley Town Council strongly supports the need for a replacement leisure centre for the town and therefore, in order to achieve the financial requirements, does not oppose a partial redevelopment of this site for housing. However, this is on the condition of the White Oak Leisure Centre being rebuilt.

For any affordable houses built on the site, we would like to see fully accessible homes for independent sheltered living for physically disabled adults. This site is close to the town centre and provides an excellent opportunity to help meet these special type of homes, which we do not currently have in Swanley, other than the White Oak Care Facility. We would like to see this type of home provided for younger and more independent physically disabled people who do not wish to live in a 24/7 'care facility' environment. Any additional capital required as a substitute for building these homes could be secured through the HO274 site.

Site HO198 – The Woodlands, Hilda May Avenue

SUPPORT. As a brownfield site, Swanley Town Council supports this site's redevelopment.

Swanley Village Ward

Site HO10 – Forge Yard

NO OBJECTION. Swanley Town Council has no objection to the development of this site as it is brownfield land. We would suggest access is made through the existing and available access through Hotham Close due to the narrow access on to Swanley Village Road.

Site HO357 – Swanley Village Nursery

SUPPORT. Swanley Town Council acknowledges the state of disrepair this brownfield site has fallen into and therefore believe a sympathetic and good quality housing development on this site would benefit the village.

Site GT16 – Park Lane Farm

STRONGLY OBJECT. Swanley Town Council does not support the expansion of Gypsy and Traveller pitches on this site. Planning approval was given initially for the very specific use of the sole individual who required it due to their requirements at the time.

The land is in the Green Belt and therefore we do not accept that expansion of this site is justified, nor are there sufficient exceptional circumstances attached to overcoming Green Belt rules to expand the number of pitches on this site.

HO298 – Land rear of cedar lodge

NO OBJECTION. Swanley Town Council has no objection to the development of this site as it is previously developed land.

HO4 - Harrington's Nursery

NO OBJECTION. Despite the joint inclusion in the plan, Swanley Town Council offers 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.

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.

Swanley Christchurch Ward

Site HO197 – Land rear of West View Road

SUPPORT. Swanley Town Council supports the potential infill of this land; however has not yet made a decision as to the future of this land for recreation or housing.

Site MX48 and Site EM4 – Pedham Place, Farningham, Horton Kirby & South Darenth Ward

OBJECT. Swanley Town Council does not believe any exceptional circumstances are present to overcome the development of this Green Belt land and Kent Downs Area of Outstanding Natural Beauty (AONB). The developer has not sufficiently addressed transport concerns for a large number of vehicular movements, particularly commuters who would use Swanley station, but also increased pressure for access to the town centre to the ASDA store (the only large supermarket in the area).

The proposed 'Park and Ride' would be thoroughly unsuccessful due to gridlock congestion heading to Swanley Station in peak times, and the lack of any dedicated bus lanes to skip the traffic. There is no tangible evidence of bus operators being able to serve Swanley with increased provision, and in particular serving areas like the High Firs/Cranleigh Drive estate, which has no bus provision at all. The Sunday Go Coach 429 service is currently being subsidised by local county councillors; however there is no mention whether this service could have its subsidy removed and number of buses per hour improved. On a Sunday, there is no bus service at all to Swanley station from the Arrive 477 service (it removed this from its route last year), and therefore we would suggest this is also critical to this site being taken forward.

In addition, the M25 roundabout would not cope with additional traffic and is already at capacity. The exceptional circumstances of this site could have funded a major upgrade of the M25 junction, which could include direct slip lanes from the M25 to the A20, M25 to M20 and M20 to M25, in order to free up capacity at this congested roundabout; however there is no detail of this in the plans. Due to the pressure on Swanley roads, this development could also fund the survey for and construction of a potential south bound exit off the A20 at the north western part of the town near the Bexley border (so that vehicles wouldn't have to go through the town), which is stated in the Swanley & Hextable transport assessment; however this again is not stated in the exceptional circumstances.

We feel the developer should also consider measures which would prevent peak journeys into Swanley, particularly traffic movements into the town centre. We believe a retail unit for a supermarket directly adjacent to the A20 would help reduce the daily pressure on Swanley roads; however this has not been included in the plans either.

We there cannot see any benefit to Swanley, Swanley Village or neighbouring villages through exceptional circumstances and therefore cannot support the development. With a potential 2,500 houses to be built, the profit levels of this would substantially pay for a lot of infrastructure improvements in the wider area.

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 objectionable that Pro Vision are attempting to re-write the history of these meetings through spurious interpretation of the recommendations and resolutions. Swanley Town Council feels that there was an irrefutable sentiment by local Swanley councillors, local residents, and councillors from across the District that there was a complete opposition to mass-development in BOTH fields north and south of the railway line.

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.

Within the Swanley Parish boundaries, this site makes up an overwhelming majority of Green Belt land. Therefore Swanley Parish would lose nearly all of its Green Belt within the parish boundaries.

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.

SDC's own Landscape Character Assessment specifically highlights this land specifically as 'settled farmland'. SDC did not carry out these assessments all over the district – only choosing to commission them for specific areas of importance.

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.

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.

Swanley Village has a rural village identity and Sevenoaks District Council specifically recommended to the Local Government Boundary Commission England (LGBCE) in 2017 that it remain in the 'Darent Valley and Sevenoaks North' Kent County Council division rather than join the enlarged Swanley division. This was due to its unique and differing character from the town, and very similar character to the villages of nearby Farningham and Eynsford.

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 Moultain 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. NOx (namely NO2) emissions are incredibly high, which affects health, wellbeing and ultimately life expectancy of local residents.

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 behind Nos 97-135 Archer Way (HO213)

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.

A footbridge and road over the railway line on this site only further exacerbate the degradation of the separation between Swanley Village and the town. Large traffic (and pedestrian) movements would certainly have a noticeable effect, diminishing the quieter and rural nature of the village.

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, which again was recognised in the council's own Green Belt Assessment. The independent ARUP consultants did not chose to sub divide this land like they did other plots of land, and therefore we do not consider it appropriate infill. We therefore wish to place on the record our objection to this specific piece of land for all the above reasons.

Local residents of Archer Way have also asked the Town Council to confirm that they can quite easily grow a number of vegetables and plants in their back gardens, directly adjacent to this site. We understand the owner of this land has stated that crops cannot be grown as it is in a 'frost pocket'; however this is contrary to the evidence provided by local residents, who have supplied photos of healthy plants and vegetables being grown. We therefore reject the notion that this land cannot sustain plant or vegetable growth.

This piece of land was originally put as an orange 'not for development category, before the exceptional circumstances site was put forward, further re-emphasising the inappropriateness of this entire proposal. We however do not support it at all being developed under any conditions.

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.

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. This facility would not only meet existing leisure need – but greatly expand 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.

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

Downsview School and primary school in the area remains undersubscribed, which has been confirmed with Kent County Council's educational department.

The expansion of this primary school would ONLY serve additional need created by this development, and potentially any development in Pedham Place. Therefore it does not meet any exceptional circumstances, as it fails to bring additional benefits to the local community – it is not infrastructure that is needed. In addition, Swanley Town Council feels an additional primary school would be better served at Pedham Place, if that were to go ahead. This is because congestion and gridlock into Swanley during rush hour would fail to allow parents to adequately bring their children to school in a timely manner.

Primary school provision in Swanley is already being met by St Mary's CoE Primary, High Firs Primary, St Bartholomew's Catholic Primary, Hextable Primary, Crockenhill Primary and Horizon Primary Academy. Several of these schools have already expanded in recent years to create additional provision and spare capacity for the years to come.

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 applications or pupils for it 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 only serve the new development and have no benefit to the wider community, as there are already an abundance of spare places across primary schools in the Swanley, Hextable and Crockenhill areas.

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

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.

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.