

# CHIDDINGSTONE PARISH COUNCIL

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5<sup>th</sup> October 2017

Sevenoaks District Council  
Argyle Road  
Sevenoaks  
Kent

Attn: Planning Policy team

Dear Sirs,

## **SDC Local Plan Issues & Options Consultation**

Chiddingstone Parish Council has considered the consultation and responds as follows:

Chiddingstone Parish Council held an open meeting with residents to discuss the potential impact of the local plan and development of sites in Chiddingstone. 60 residents attended. We have had additional correspondence from several residents. We have taken residents' views into consideration, and have made a judgement about where the balance of views is amongst residents and the relevance of comments made. The Parish Council has been generally supportive, with minor caveats, of the plan with two notable exceptions – Newtyehurst Farm and Richard's Close Garages. The Parish Council has responded with answers to the specific questions and with general and specific views on the sites selected in the Parish.

- T1: Chiddingstone Parish Council would support Approach 1: development on Brownfield sites only.
- T2: Yes agree to 40% Affordable Housing requirement.
- T3: Yes agree to the small sites policy of SDC seeking financial contributions on sites for 10 new homes and under.
- T4: Yes we agree that new innovative types of affordable housing should be considered such as starter homes. We think SDC should also consider homes for the retired age group too.
- T5: Yes we agree to a mix of house sizes for both market and affordable housing.
- T6: Yes we agree to sites being allocated for older persons accommodation to encourage down-sizing. We also agree to a proportion of older persons accommodation being included in affordable housing schemes.
- T7: Yes we agree to a requirement of Lifetime Homes and homes suitable for people with disabilities.

- T8: We think that discussions on whether existing Gypsy & Traveller sites with temporary permission should become permanent sites must be considered on a site by site basis rather than a blanket permission.
- T9: Yes we think SDC's existing Green Belt policies are working.
- T10: Yes further guidance would be useful on national Green Belt policy, particularly in relation to development on brownfield sites in the Green Belt.
- T11: Yes we agree that the Local Plan should include a policy to ensure that new developments include appropriate green infrastructure, areas for biodiversity and pedestrian friendly routes.
- T12: Yes we would support a new policy for rivers and areas of open water.
- T13: Yes we would support a policy affording protection to locally designated areas across the district.
- T14: Yes we support the encouragement of high standards of design across the district.
- T15: Yes we would support the production of a new SPD on design.
- T16: Yes we consider that employment sites in the rural area are very important, both for the rural economy and to give employment to local people. Small employment sites in the Green Belt would be supported, and yes we would support the increase in length of change-of-use marketing requirements from 6 to 12 months in the local area.
- T17: We think that each site should be considered on its own merits, rather than a redevelopment hierarchy.
- T18: We think that brownfield sites could be used for employment use, depending upon the site, and redundant farm buildings could be used for employment use, again depending upon the site.
- T19: We think that permitted development rights should be removed for both existing and new office provision, and a full planning application should be submitted instead. This would ensure that there is a full consultation process with local people and Town and Parish Councils.
- T20: Yes we agree that there should be a policy to protect, support and encourage tourism businesses, visitor accommodation and visitor attractions, particularly including heritage assets.
- T21: Yes we agree to retail floor space being allocated in town centres and in mixed use sites.
- T22: We agree that comparison retail (no-food) and convenience retail (food) floor space should of course be located in the district's most sustainable settlements. However, it is important that other settlements also have their share of these uses in order to encourage regeneration and improve the economy of possibly less vibrant areas.
- T23: Yes we would support your proposal to introduce a local threshold of 500m<sup>2</sup> for Retail Impact Assessments.
- T24: Yes we agree that stronger evidence should be sought that retail units are unviable before granting planning permission to convert to other uses. This should be done via a planning application rather than permitted development so that there is a full consultation process with local people and Town and Parish Councils.
- T25: Town and local centre boundaries should be considered on a site by site basis, with full consultation with local people and Town and Parish Councils.

- T26: Yes we agree that there should be increased opportunities to deliver sustainable transport across the district.
- T27: Yes we agree that Travel Plans should be required as part of a planning application for traffic generating developments in order to mitigate the impact of future transport requirements.
- T28: Yes we agree that all new developments should detail how access to high quality communications / digital infrastructure will be provided. If possible this should also be extended to nearby properties in order to mitigate the impact of the new development on the local area.
- T29: Yes we agree that you should work with partners to ensure that the infrastructure implications of new development are addressed.
- T30: Yes we agree that Infrastructure Delivery Plan and CIL Regulations are reviewed every four years.
- T31: Yes the Local Plan should be linked to the Council's Health Deal.
- T32: Yes we agree that public health could be improved by the provision of shared public spaces and improved design.
- T33: The Local Plan should require Health Impact Assessments, particularly on air quality in this area due to the impact of aviation and road pollution which has a devastating impact on health and well-being.
- T34: We agree that air quality is of vital importance in this area. We urge the District Council to carry out air quality assessments in relation to aviation pollution. There must be a proper action plan in place to monitor and assess air quality from aviation as well as road pollution.
- T35: Yes we agree to the production of a new Transport Plan.
- T36: There could be agreements set up with schools for out of school hours and weekend community use of school leisure facilities. However, safeguarding is vital and the children's health and fitness is of prime importance as the facilities were provided for that purpose.
- T37: Yes the quality and quantity of existing and new leisure facilities should be encouraged.
- T38: Yes there should be a requirement for new housing developments to provide outside play areas. Could the District Council consider a grant scheme to help generate new play areas where there are none regardless of whether there is a new housing development?
- T39: Yes we agree that the currently allocated open spaces are protected. We couldn't locate the Open Space Study interactive map on your website so cannot comment further on this question.
- T40: Yes we agree that there should be a policy covering flood risk and more detailed guidance on flooding and drainage. The new developments may be successful in reducing the volume of surface water runoff, but KCC needs to ensure that the existing drainage system off the new development site is also well maintained in order to stop surface water issues. In rural areas, this is of vital importance particularly on roads that are not on the gritting circuit. Development in Flood Zones should be considered very carefully even if additional measures are in place.
- T41: Yes the Local Plan should include measures to mitigate the impact of climate change and adapt to the changing climate.
- T42: We cannot comment on the potential priority issues in the Upper Darent Corridor as comments should be sought from the Town and Parish Councils and residents of that area.

- T43: We cannot comment on the potential priority issues in the Darent Valley as comments should be sought from the Town and Parish Councils and residents of that area.
- T44: We cannot comment on the potential priority issues in the North East as comments should be sought from the Town and Parish Councils and residents of that area.
- T45: We cannot comment on the potential priority issues in the Sevenoaks Urban Area and Surrounds as comments should be sought from the Town and Parish Councils and residents of that area.
- T46: We agree that the need and potential provision of a new health and post-11 education hub should be considered in Edenbridge. This should be subject to full and proper consultation with the residents of Edenbridge and the surrounding areas, and Town and Parish Councils. We agree that shops, services and community facilities and employment in Edenbridge and the local villages should be protected but also that new opportunities are encouraged. The Leather Market area in Edenbridge should be developed into a mixed use scheme. It is an eye sore with so many closed shops and the landowner should be made to sell the land to allow a mixed development. Flood risk, SuDs and the potential impact on the area from the Leigh Flood Barrier should be addressed. Development on the Ashdown Forest should be controlled, but SDC should consider the impact of possible new policies in Wealden District Council's Local Plan on the possible embargo on development in a 25km zone around the Ashdown Forest as this would have an impact on potential development in SDC area.

Please see below Chiddingstone Parish Council's comments on individual sites included in the consultation in our parish.

- T47: We cannot comment on the potential priority issues in the North West as comments should be sought from the Town and Parish Councils and residents of that area.

### **Specific Sites identified for possible development within the Chiddingstone Parish**

#### **General view**

Any new development in Chiddingstone Parish would place considerable further pressure on services, infrastructure and the environment. The primary school is full and over-subscribed, the doctors' surgeries in Edenbridge and Penshurst are also full and under strain. The level of traffic on small country roads means they are often potholed. Parts of the parish are National Trust property, there are two conservation areas and much of the southern part of the parish lies in the protected landscape of the High Weald AONB. The nature of the planned schemes using high density housing whilst consistent with protection of the Green Belt is not consistent with the current dispersed nature of the parish housing. Whilst generally supportive of use of brownfield to protect Green Belt, new housing cannot, should not. If there is new housing, there is the risk that children of existing families would not be offered a place at their local primary school. The Parish Council objects to any high density large scale development and in particular would remind the council that proposals in the AONB must have had due regard for their protected status and must enhance the landscape. (Paras 14 and Footnote 9 of NPPF)

## **Site specific comments**

### **Garages at Richards Close, Chiddingstone Causeway. Site ref: HO45**

SDC's view on approximate yield: 1-2 residential units

Chiddingstone Parish Council strongly objects to the development of this site on the following grounds.

- It would remove vital parking spaces for existing residents of Richards Close and Dukes Meadow. This has already been reduced by the recent planning consent to develop of land north-east of Stonelake Cottages, Camp Hill. In the evenings and at weekends, the area in front of the garages, Richards Close, Dukes Meadow and the road to Camp Hill are all full of parked cars. If the garages are developed it would remove this parking facility for existing residents and the residents of the proposed new dwellings.
- The Parish council is concerned that the sub-station in Richards Close could not handle additional housing in Chiddingstone Causeway and would need to be upgraded or moved to a larger site. In subsequent drafts of the Local Plan the Parish Council would expect to see this specifically addressed.

### **Redleaf Estate Yard, Camp Hill, Chiddingstone Causeway. Site ref: HO108**

SDC's view on approximate yield: 4-5 residential units

Chiddingstone Parish Council does not object to the development of this site, but urges SDC to consider a lower density scheme of 2-3 residential units, rather than 4-5 residential units due to the impact on the infrastructure and impact on the rural area.

### **Causeway House, Tonbridge Road, Chiddingstone Causeway. Site ref: HO115 /HO257**

SDC's view on approximate yield: 7-11 residential units and the retention of B1(a) office floorspace

- Chiddingstone Parish Council supports the retention of the B1(a) office floorspace on this site as this is important for the rural economy and for local employment. Employment use of these buildings also supports the small village shop, which counts on business from employees on this site.
- Chiddingstone Parish Council is concerned about the high risk of surface water flooding if this site is developed, this can be seen on the Environment Agency website. If this site is to be considered for residential use alongside the B1(a) office use, then it is vital that this risk is mitigated by a water storage or a run off drainage system.
- It is vital that only a low density housing scheme is allowed. 7-11 residential units is too high and the Parish Council would not support a scheme of more than 5 residential units.
- It is vital that there are sufficient parking spaces included on this site.
- The Parish Council would not support any street lighting on this site.
- There is concern about the impact on the infrastructure, particularly the local primary school and doctors' surgeries.

### **Station Yard, Station Hill, Chiddingstone Causeway. Site ref: MX12**

SDC's view on approximate yield: B1-B8 floorspace

Chiddingstone Parish Council supports a B1-B8 use only on this site as this is important for the rural economy and for local employment.

### **Highways Depot, Tonbridge Road, Chiddingstone Causeway. Site ref: HO109**

SDC's view on approximate yield: 6-8 residential units

Chiddingstone Parish Council does not object to the development of this site, but urges SDC to consider a lower density scheme of 4-6 residential units, rather than 6-8 residential units due to the impact on the infrastructure and impact on the rural area, particularly the local primary school and doctors' surgeries.

### **Newtyehurst Farm, Cowden Pound Road, Markbeece. Site ref: HO255**

SDC's view on approximate yield: 34-46 residential units

Chiddingstone Parish Council strongly objects to the development of this site on the following grounds:

- This site is in the Green Belt and AONB. The Green Belt should not be changed to allow development of this site. Agricultural buildings are currently not classed as brownfield sites and they are not urban sites – they are rural sites in the countryside. The Parish Council does not support SDC changing their Green Belt policy to allow development on this site.
- This is a peaceful area of tranquillity. We do not support a large development on this site which would be a transformational change for this small hamlet and have a negative impact on the delicate ecosystem. There would be a large percentage increase in population which would have a negative impact on existing residents and change the very nature of this special place.
- Such a large development would have a hugely detrimental impact on local infrastructure and services, particularly the local primary school and doctors' surgeries, but also increased traffic on the narrow lanes around the site. Generally, the current infrastructure is incapable of sustaining such a large development. There is no mains sewage or gas. BT does not supply high speed broadband in this area.
- There are extremely limited public transport links in this area. There is one school bus to Tunbridge Wells once a day and that is all, and no trains. There are no pavements to allow easy walking to other public transport links. The nearest railway station is Cowden which is 1.25 miles away along unlit steep narrow country lanes.
- The size of this proposed development is out of all proportion to the surrounding neighbourhood.
- The proposed development is of a far too high density to enhance the AONB.
- Residents report a number of rare species on or near the site, eg Nightingales, Great Crested Newts and Purple Emperor Butterflies. A full environmental impact survey is required.
- There is a strong feeling amongst residents that if approval is given to develop this site, other sites in the AONB and Green Belt would be under threat and it would set a precedent. These designations are set to protect the environment. They should not be lifted to allow development as that directly contravenes the policies set up to safeguard these areas.
- The Parish Council recognises that the conversion of redundant agricultural buildings is an important part of the local plan. However there are many farms that have diversified by selling the old farm buildings for residential development and now have large barns for the purpose of making farming economically viable. The Parish Council suggests that the designation of these new barns as brownfield and then allowing development is neither in the spirit or the letter of the law. It contravenes the NPPF in an AONB. Mass conversion of these new barns to residential or designation as brownfield would fundamentally change the landscape and communities in which they sit.

Louise Kleinschmidt

Clerk – Chiddingstone Parish Council