

# **FAWKHAM PARISH COUNCIL**

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4<sup>th</sup> September 2018

This document is the response of Fawkham Parish Council to the proposals detailed in the Sevenoaks District Draft Local Plan Consultation July 2018.

The response comprises a covering letter, and three Appendices.

Below is the list of the referenced settlement/sites described in Policy 2 – Housing and Mixed Use Site Allocations and the considered response of Fawkham Parish Council. The detail of response can be found in Appendix 1 – Major Concerns.

## **Ref - MX52 & MX53 – Corinthians and Banckside**

Fawkham Parish Council strongly opposes this proposed development.

## **HO51 – Eureka Naturist Club, Manor Lane**

Fawkham Parish Council are open to the possibility of development on this land if the access issues are addressed and no further development is considered for this site.

## **HO378 – Grange Park Farm, Manor Lane, Fawkham**

Fawkham Parish Council opposes this proposed development.

## **HO165 – Fawkham Business Park, Fawkham Road**

Fawkham Parish Council opposes this development.

## **General Comments on the proposed Sevenoaks District Draft Local Plan.**

Fawkham is a small rural settlement comprising of 220 houses and just over 500 people and it is classed by Sevenoaks District Council as a hamlet. It also contains the conservation area of Baldwins Green.

Given this classification, the Council is concerned that Sevenoaks District Council have seen the need to include 4 developments in the Sevenoaks District Draft Local Plan all of which have potentially severe negative impact on the village of Fawkham. If all of these developments are implemented it would mean 876 new houses being built and approx. 2014 new residents coming into the area. All in an area that is classed as a hamlet. Fawkham Parish Council understand the need to develop new housing and are not opposed to considered development that fits within existing infrastructures. It is the view of the Council there is clearly insufficient existing infrastructure or facilities to support the large-scale development outlined in the Sevenoaks District Draft Local Plan Consultation July 2018. Were the proposed developments to be implemented, the rural nature and identity of Fawkham will be forever

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changed and in all probability Fawkham would be merged into the existing settlements of Longfield and Hartley.

Given the potential impact of the proposed developments upon Fawkham, the Council is surprised at the lack of effective consultation by Sevenoaks District Council.

Consultation should be a meaningful two-way dialogue to gain the views of the community. Sevenoaks District Council has clearly failed in this endeavour. The singular consultation was held during the summer holiday period and has proven difficult for everyone to fully engage in the consultation process. Were Sevenoaks District Council intent in having a meaningful consultation, the consultation period should have lasted until at least mid-October to give everyone an opportunity to understand and respond.

In conclusion Fawkham Parish Council believe that the proposed development MX52 & MX53 should not be included in the local plan as there is insufficient existing infrastructure to justify such a large development and the developer has failed to meet the requirement of exceptional circumstances as defined by SDC.

If you would like to discuss any issues raised in this letter please contact the Council on 01474 852686.

Yours sincerely

Fawkham Parish Council

Cllr M. Pearsall (Council Chairman)

Cllr A. Evans

Cllr D. Harker

Cllr S. Gray

Enc: Appendix 1,2 & 3

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## **Appendix 1 – Major Concerns**

### **A1 - 1**

#### **MX52 & MX53 – Corinthians and Banckside**

Fawkham Parish Council strongly opposes this development.

The concerns of the Fawkham Parish Council are that:

- The proposed development does not meet the definition of Exceptional Circumstances as provided by SEVENOAKS DISTRICT COUNCIL and consequently there is no reason why such a development of this size should be considered on green belt land.
- A vast proportion of the proposed development is in the bounds of Fawkham Village and not in Hartley (as proposed by the developer).
- Fawkham is a small settlement of approx. 220 houses and 500 people. The existing infrastructure cannot support a development of such magnitude.
- Fawkham is classed in the Sevenoaks District Council settlement hierarchy as a hamlet. According to this classification such hamlets:

*“have very small populations (fewer than 1,000 inhabitants) and have limited range of services and facilities. All the settlements in this classification are washed over by green belt. As such it would be unrealistic to expect these to accommodate much new development.”*

Bearing in mind this classification, the Council questions why such a development has been proposed in the Draft Local Plan.

### **A1 – 2**

#### **HO51 – Eureka Naturist Club, Manor Lane**

Fawkham Parish Council are open to the possibility of development on this land.

The Council supports the proposal that 12 new houses are sustainable in number and could add value to village life. The Council is concerned however, that Manor Lane is very narrow and offers limited access to the proposed site. The Council would want strong assurances from Sevenoaks District Council that, if this proposed development is allowed, there is an agreement that no further development will be permitted on this site

### **A1 – 3**

#### **HO378 – Grange Park Farm, Manor Lane, Fawkham**

Fawkham Parish Council opposes this proposed development.

The proposal to put 32 houses on this land is deemed excessive. There are currently 220 houses in Fawkham and approx. 500 people. Were this proposal agreed, there would be an increase in both the number of houses and the population by over 14%. As previously stated, Fawkham is classed as a hamlet by Sevenoaks District Council settlement of hierarchy and as such should not accommodate new development.

There are no general or detailed infrastructure improvements proposed for this development therefore the development would only add to the current infrastructure concerns that already exist. The Council

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is clear that the current infrastructure in Fawkham will not support a 14% increase in both housing and population.

## **A1 – 4**

### **HO165 – Fawkham Business Park, Fawkham Road**

Fawkham Parish Council opposes this development.

The Council understands the need for housing, however Fawkham Business Park provides valuable employment in this area and to lose this would be seen as a retrograde step for the surrounding communities. The Council is also concerned that given the position of this development, access would be limited and would inevitably cause additional congestion on Valley Road.

The proposed development in Fawkham Business Park is virtually the same size as that of the proposed development at Grange Park Farm (31 and 32 homes respectively). Consequently, the same arguments of lack of infrastructure and settlement of hierarchy applies.

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## **Appendix 2 – Detailed Observations and Questions**

### **A2 – 1**

#### **Detailed Observations**

Fawkham Parish Council (and to our knowledge Hartley Parish Council) were not given advanced notice of the Sevenoaks District Draft Local Plan Consultation July 2018, and only found out when it was communicated to the public. The potential developer and its partners in the proposed MX52 and MX53 development, had already started to communicate out their plans before Parish councillors had a chance to review, discuss and devise a strategy. This meant that the Parish Council were initially unprepared and our parishioners were unable to gain unbiased information rather than the views of the proposed developer. As Parish Councils are key stakeholders in this process and an invaluable forum of communication, the Parish Council is surprised that SEVENOAKS DISTRICT COUNCIL decided to ignore us in the consultation process.

The only meeting organised by SEVENOAKS DISTRICT COUNCIL to discuss the proposed developments was held in Hartley on 31<sup>st</sup> July and took the form of a walk-in consultation. Despite four proposed developments, that would have a major impact on Fawkham, no meeting was arranged in the village. A number of FAWKHAM PARISH COUNCIL members attended this meeting. The members of staff from SEVENOAKS DISTRICT COUNCIL who had arranged the meeting had vastly underestimated the number of people who would attend. This meant that the meeting was understaffed and the majority of those who attended the meeting did not have the chance to discuss the proposals with SEVENOAKS DISTRICT COUNCIL staff. A lot of people left the meeting feeling very frustrated. Members of FAWKHAM PARISH COUNCIL waited until the end of the session and were eventually able to speak to a member of the SEVENOAKS DISTRICT COUNCIL team. This was a frustrating experience. The member of staff said that they were a member of the team who had assessed the proposals to include into the local plan. They clearly had no knowledge of the area, its demographics or even the historical planning decisions that had previously been tabled in the proposed sites. The member of SEVENOAKS DISTRICT COUNCIL staff did admit that the meeting was the busiest she had attended. Despite this no further meeting was arranged by SEVENOAKS DISTRICT COUNCIL in either Hartley or Fawkham to give residents the opportunity to review and discuss the Sevenoaks District Draft Local Plan Consultation July 2018. In order to ensure that the residents impacted are adequately briefed about the proposed development, local action groups and Parish Councils have held a number of meetings. The Parish Council hopes this has filled the gap created by SEVENOAKS DISTRICT COUNCIL and that local residents now feel better briefed. The Parish Council are concerned however, that this is the case as the Parish Council members only found out about the proposals at the same time as the public.

The consultation process has also been made more difficult by the fact that SEVENOAKS DISTRICT COUNCIL has apparently allowed the potential developer linked with proposals MX52 & MX53, to change the proposals mid-way through consultation. When consultation was started there was a proposal to build approx. 25 houses on the meadow adjoining Fawkham church. The Parish Council was always surprised at this proposal as it is in the conservation area of Baldwins Green. The potential developer has appeared to have changed this and a proposal to plant woodland is included instead. Although Fawkham Parish Council support the decision not to build on the proposed site the Parish Council are also very concerned that SEVENOAKS DISTRICT COUNCIL have allowed the potential developer to change proposals mid-way through consultation and did not directly inform Fawkham Parish Council or any other stakeholder of the change. The Parish Council are very worried that further non-beneficial changes will be accepted during the consultation period and impacted stake holders will not have a chance to comment. If this does happen, the Parish Council would question the validity of

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the whole consultation process and feel that it would only be appropriate that the impacted developments be rejected from the draft local plan.

## **MX52 & MX53 – Corinthians and Banckside.**

Given the size and scope of the proposed development the Parish Council feel that it is important that more detail is presented on why the Parish Council oppose this development so strongly.

## **Settlement Hierarchy and associated infrastructure.**

A large proportion of the proposed development in MX52 and MX53 is in Fawkham and not in Hartley as stated by the potential developer. Whilst it is a fact that Hartley will be impacted by the proposals, it is in Fawkham where the majority of the development will take place.

One of the major proposals is the development of Corinthians sports ground. Corinthians is in Fawkham and has a Fawkham postal address. Additionally, the proposed country park, relief roads and allotments, are all in Fawkham Therefore, Fawkham and not Hartley should be used as the settlement for reviewing infrastructure and the impact that the proposed development will have.

The Parish Council were curious why the potential developer does not mention Fawkham but describes the area of proposed development as expansion of Hartley. The Parish Council then reviewed the SEVENOAKS DISTRICT COUNCIL settlement hierarchy classification. In this classification Fawkham is seen as a hamlet and Hartley is seen as a local service centre. This means that Fawkham is at the bottom of the hierarchy whereas Hartley is nearer the top. According to SEVENOAKS DISTRICT COUNCILs assessment, Hartley has an infrastructure rating of 41 and Fawkham has a rating of 10. SEVENOAKS DISTRICT COUNCIL state in their document.

*“The settlement hierarchy for Sevenoaks District is a key piece of evidence that will be used to prepare the emerging local plan. It helps define the role and function of each settlement within the District. This document will help inform the profile of settlements as well as their capacity to accommodate future development requirements.” ..... “At the top of the hierarchy are the larger settlements that fulfil most functions, have the best infrastructure (facilities and services) and are the most accessible by sustainable forms of transport. The smaller settlements with fewer functions, infrastructure and transport links are nearer to the bottom of the hierarchy. This will help the Council determine which settlements are most suitable to accommodate additional growth.”*

The document also states:

*“These hamlets have very small populations (fewer than 1,000 inhabitants) and have limited range of services and facilities. All the settlements in this classification are washed over by green belt. As such it would be unrealistic to expect these to accommodate much new development.”*

Fawkham Parish Council argue that the majority of the proposed development is in fact in Fawkham and not Hartley. If SEVENOAKS DISTRICT COUNCILs own definition of settlement hierarchy is used, there is clearly not enough current infrastructure within Fawkham to sustain such a large development. This reason alone should signify that the proposed development be removed from the Sevenoaks District Draft Local Plan Consultation July 2018.

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Should the development commence as proposed, then Hartley, Longfield and Fawkham will be merged into one community entity. This wantonly contravenes the National Planning Framework that recommends such settlements retain their own identity.

Fawkham is a rural hamlet that includes the **Baldwins Green** Conversation area. This is a 2.8-hectare area that contains a listed building and is classed as an area of local landscape importance. The lower segment of Castle Hill falls into this area and means that the proposed development of Castle Hill would be in a conservation area. The potential developer promises greater pedestrian access in the new development. To do this in Fawkham would mean widening the road at Valley Road and destroying trees that are in the Baldwin Green conversation area.

**Valley Road** is the main thoroughfare for Fawkham. It is classified by Kent Highways as a single carriageway with 2 lanes (one in either direction). The standard width of such a road is defined as being 5.5 to 7.3m. A minimum width of 5.5m is the accepted width for 2 cars to pass safely at low speed. The potential developer in “A Community Vision for Hartley document state

*“Valley Road measures approximately 5.5m in width and therefore accommodates two-way traffic flows.”*

This statement is clearly incorrect. The road is a lot narrower at certain points than the 5.5m stated. A group of concerned local residents measured the road (see Appendix 3) and found that at many points, especially to the south of the proposed development, the road narrowed to less than 5.5m.

## Exceptional Circumstances

### Green Belt

In order to build on greenbelt land, it has to be evidenced that exceptional circumstances have been met. Although there is no definition in planning law of exceptional circumstances SEVENOAKS DISTRICT COUNCIL has stated that they will view exceptional circumstances as :

*“greenfield green belt sites which provide social and community infrastructure benefits that address genuine needs in the area.”*

Fawkham Parish Council argues that exceptional circumstances are not met in the case of the proposed developments MX52 & MX53 and consequently there is no obligation to develop on this area of green belt.

### Country Park.

Fawkham Parish Council are unaware of any request for a Country Park from residents. There is no defined need for this and no justification for the loss of active agricultural land. There are already 6 country parks within 5 miles of both Fawkham and Hartley. The surrounding woodlands of Hartley and Fawkham also provide an opportunity for local residents to enjoy the countryside. The proposed car park and café would add unwanted traffic to the already crowded roads and add to pollution.

The proposed development of the country park would spoil the vista of the conservation area of Baldwins Green.

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## **Schools.**

Both Hartley Primary and Milestone schools have an Ofsted rating of Outstanding. This is evidence of the current level of education provided and is regarded as the highest standard and could not be improved by the moving of the schools. The proposed location of the schools is less central to Hartley than the existing one. This would mean that parents who currently walk their children to school may have to drive adding more congestion to the roads.

There does not appear to be a shortage of places in local primary schools. This was shown by the fact that a number of local primary schools in the area did not fill their planned admissions number for reception classes last year. Our Lady of Hartley (Ofsted outstanding) made 21 offers compared to 30 places, Horton Kirkby and West Kingsdown were also in a similar position. Any shortage would only be caused by the proposed development so if the development does not go ahead there is no need for the moving of the schools.

The potential developer does not state whether Fawkham primary school has been consulted. The Parish Council are surprised that this has not been done. As the major proportion of the development is in Fawkham the impact on Fawkham primary school will be huge.

With such a proposed development the Parish Council would argue that secondary school provision should be looked at rather than primary education. It is increasingly difficult for local residents to gain the secondary school of their choice especially in the local grammar schools. The proposed development would just make this worse.

## **Sports facilities.**

The local area is well served for sports facilities. There is no need for the facilities as proposed by the potential developer. There are current sports provisions available at: Corinthians sports ground Fawkham, the Body clinic Fawkham, the boxing stables Fawkham, Brands Hatch Place gym, Hartley Country Club, and the Clockhouse Gym at New Ash Green. A wide variety of exercise classes are offered at the local village halls.

A public access gym is situated on the Milestone school site as well as a hydro swimming pool and gym hall. These current sports facilities are currently used by local families in a range of activities such as baby swimming run by Water Babies franchise and gymnastic classes run by Beaming Stars. So, the introduction of any new sports facilities would not be an improvement for local residents as the ones that they use have been taken away.

## **Relief Roads.**

A new relief road is proposed for Castle Hill. The Parish Council are not sure why this is proposed as it is not needed. The road is not a particularly busy road. It is a narrow road in keeping with the rural hamlet of Fawkham. The bottom half of the road is located in the Baldwins Green conservation area. Any amendment to this road would negatively impact this area.

Given the narrow nature of the roads in Fawkham it is unlikely that any of the proposed road improvements could be implemented without the destruction of a large proportion of trees and hedgerows.

## **Pedestrian walk ways and transport.**

Longfield Southeastern Railway Station is already very overcrowded. Parking in Longfield village is already a problem. The station car parks are becoming increasingly full and could not take the extra capacity that would be caused by the proposed development. This is compounded by the fact that



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potential developer who is proposing MX52 and MX53 has permission to build 70 apartments on the second station car park.

The potential developer suggests that people could walk or cycle to the station with new pedestrian walkways. This would be impractical on the Fawkham side of the development. As evidenced previously in this document, Valley road is just too narrow to facilitate any cycle lanes or pedestrian access. If widening of the road was possible (and it is not), it would mean the purchase of private land some of which is in the conservation area of Baldwins Green.

## **Health Care Provision.**

There is a need for more GPs in the area. The Jubilee Medical Practice has recently undergone a recruitment exercise and new GPs have just been recruited which is positive. The nationwide shortfall of GPs will not be solved by building a new medical centre. Indeed, a new medical centre may even compound the problem by creating local competition for GPs.

On the website “A vision for Hartley”, the potential developer states that they have worked in partnership with Jubilee Medical group to provide a new GP surgery. They also state that a 7 day , 8am – 8pm Health Care Centre is proposed in response to local needs. Fawkham Parish Council are unaware of such local needs. The Jubilee Medical Group issued a statement that contradicted the potential developers. They stated that they have had no formal involvement with the proposals and it is unlikely that they have the resources or capacity to take on the new residents. The Jubilee Medical Group stated they were not aware of any planned extra provision for 8-8 seven-day week services and this is not something that they would provide directly.

It does appear that the potential developer has just placed the health centre on their wish list to meet the criteria of exceptional circumstances rather than consult with partners and work on a concrete proposal.

The Parish Council would argue that in the area of medical provision it is tertiary rather than primary care that should be reviewed. Darenth Valley hospital which services the local area is currently running over budget. They are struggling to meet the demand created by the new development in Ebbsfleet. This means that they are nearing their upper level in maternity services. A development the scale as proposed would have a major impact on the hospital.

The Parish Council understand that SEVENOAKS DISTRICT COUNCIL has not consulted or approached Darenth Valley Hospital to discuss such an impact before including MX52 and MX53 on the draft plan. This does appear to be a serious oversight.

## **Allotments.**

The local residents have no need for additional allotments. This proposal is just a box ticking exercise for the potential developer to try and justify that the development on the green belt meets exceptional circumstances. The majority of houses in Fawkham are lucky enough to have enough outside space to be able to grow their own vegetables or plants if they so wish. There are already 2 allotment sites (Woodland Avenue allotments and Ash Road allotments) in Hartley.

The proposed site of the allotments is currently used as playing fields and forestry school for Steephill School. The introduction of allotments on this site, far from meeting a need, would actually take away valuable outside space where local children play and develop.

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## **Community Centre.**

There are currently 5 community centres/village halls in the locality. The Parish Council are currently trying to encourage more people to use the village hall in Fawkham. There is no need for any more such facilities in the area.

It is opinion of Fawkham Parish Council that the potential developer has just suggested these proposals to tick the box of exceptional circumstance rather than address genuine local needs.

The Parish Council would also argue that in the area of medical provision it is tertiary rather than primary care that should be reviewed. Darenth Valley hospital which services the local area is currently running over budget. They are struggling to meet the demand created by the new development in Ebbsfleet. This means that they are nearing their upper level in maternity services. A development the scale as proposed would have a major impact on the hospital. The Parish Council understand that SEVENOAKS DISTRICT COUNCIL has not consulted or approached Darenth Valley Hospital to discuss such an impact before including MX52 and MX53 on the draft plan. This does appear to be a serious oversight.

## **A2 – 2 Questions**

1. If the aim was to provide an effective consultation process could you please explain why an additional meeting was not arranged in either Hartley or Fawkham and why consultation was held during the annual holiday period?

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## Appendix 3 – Supporting Data

### A3-1 Valley Road Width Measurements

The narrowest measurement taken was only 3.7m, well below the width at which 2 cars can safely pass at low speed. None of the 23 measurements taken on the 1.3 mile stretch of Valley Road between Scudders Hill and Sun Hill were at or above 5.5m and only one was wider than 5m. 15 were less than 4.5m of which 5 were less than 4m. The roads are currently busy and used daily by HGVs assessing businesses on Scudders Hill and the Fawkham Business Park. Valley Road is not wide enough to accommodate a bus route (6 m) or a cycle path meaning that the proposed development would create further dependency on car transport.

#### **North of proposed development:**

|                                  |       |
|----------------------------------|-------|
| Fawkham Business Park/Salts Farm | 4.60m |
| At Wayside                       | 5.75m |
| Junction with Steep Hill         | 6.30m |
| St Mary's Church entrance        | 5.00m |

#### **South of proposed development:**

|                                  |                                   |
|----------------------------------|-----------------------------------|
| At Hillside                      | 5.10m                             |
| Scudders Hill                    | 4.75m                             |
| At Valley Apiaries               | 3.90m                             |
| At the Brambles                  | 4.04m                             |
| At the Meadows                   | 4.10m                             |
| Junction with Manor Lane (north) | 3.84m                             |
| Junction with Manor Lane (south) | 4.40m                             |
| By Court Lodge                   | 4.60m                             |
| Beyond Court Lodge               | 3.70m (narrowest point in survey) |
| At Elm Cottage                   | 3.95m                             |
| By Malabar                       | 4.10m                             |
| At Ridgewood                     | 3.95m                             |
| At West Lodge                    | 4.04m                             |
| By Six Acre Cottages             | 4.20m (to kerb beyond white line) |
| Fawkham School entrance          | 4.05m                             |
| Just past Fawkham School         | 4.60m                             |

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|                                    |       |
|------------------------------------|-------|
| School 'slow' sign                 | 5.00m |
| Blind bend                         | 5.04m |
| Next bend                          | 4.90m |
| Next bend                          | 4.75m |
| 30 mph road sign                   | 4.20m |
| Junction with Speedgate            | 4.70m |
| <br>                               |       |
| Junction with Michaels Lane        | 4.74m |
| Junction with Rising Sun pub/green | 4.48m |

All widths measured from inside of painted white line to inside of painted white line, unless indicated differently above. Measurements taken 15.08.18, when road closed for repair.