

Dunton Green Parish Council has submitted its response to SDC's consultation on Plan 2040 and it urges all residents who have concerns about Green Belt development in the village to respond. The deadline is 11<sup>th</sup> January and there is one final opportunity to attend a public session on the Plan at Sevenoaks Leisure Centre on Tuesday 9<sup>th</sup> January 4.30pm to 7.30pm.

There are TWO Dunton Green sites listed in the 'Baseline' sites for Plan 2040: HO10 - Land east of London Road, Dunton Green (GREEN BELT / HO / 235 units) and H08 - Pounsley House, Pounsley Road, Dunton Green (GREENBELT / HO / 7 units)

This is why DGPC has concluded that it cannot support any of SDC's proposed Options (1, 2 or 3) and has indicated that it supports none of them. To support these options would be to support inclusion of the Dunton Green sites.

Details about the Plan and information about how to respond can be found at SDC's website

<https://www.sevenoaks.gov.uk/plan2040>

Dunton Green Parish Council's full response is below.

Plan 2040	COMMENTS
	<p>Dunton Green Parish Council refers Sevenoaks District Council to comments made by DGPC to the Plan 2040 Regulation 18 (Part 1) Consultation (submitted 11/01/2023) and to comments previously submitted in relation to the earlier emerging Local Plan in 2018 (the Local Plan that was subsequently not approved).</p> <p>Fundamentally, there is nothing that has changed the Parish Council's viewpoint with regard to development in the Green Belt.</p>
Green Belt site development - general	<p>Dunton Green Parish Council accepts that the District Council is under enormous pressure to submit a Local Plan that actually has some chance of being adopted. However, of the 11 Green Belt sites listed under Baseline sites (which are effectively sites that SDC Planning has already allocated to be included in Plan 2040), two are in Dunton Green. This is untenable when there are Brownfield sites across the District that should be used first. Dunton Green's Green Belt cannot be sacrificed just because of an erroneous categorisation of Dunton Green as an 'urban' area and an assertion that its Green Belt is 'poorly performing'. Policy ST1 is far from 'balanced' when it comes to Dunton Green.</p> <p>All Green Belt was created equal and there is no such thing as poorly performing Green Belt. Green Belt is sacrosanct. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Government policy on protection for the Green Belt is set out in chapter 13 of the National Planning Policy Framework (NPPF), which opens by stating that the Government attaches great importance to Green Belts. On protecting the Green Belt, the NPPF urges Local Planning Authorities (LPAs) to maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries. The NPPF demands that there should be "exceptional circumstances" before Green Belt boundaries can be changed and says that inappropriate development is harmful to the Green Belt and should be approved only in "very special circumstances".</p> <p>And before any development on any Green Belt in the District, what is being done to use empty homes? In Kent there are some 7847 empty properties and 9551 second homes! Empty and unused residential and commercial properties need to be utilised to reduce the overall requirement for new homes. What is being done to address this issue in the District?</p>
Green Belt site development - Dunton Green	<p>Dunton Green Parish Council asks why there are two Green Belt sites within the Baseline sites in Dunton Green? Just what are the exceptional and very special circumstances that justify proposals for development on two Green Belt sites in Dunton Green?</p>

	<p>Why is Dunton Green being ‘targeted’ for yet more development when other villages do not appear to be taking their fair share of development?</p> <p>Since Dunton Green lost its identity as a village in SDC planning terms and became part of Sevenoaks ‘Urban’ Area, it has borne development of Ryewood (500+), McCarthy Stone (35+) and now Fort Halstead (a considerable proportion of which is within the parish boundary of Dunton Green). We repudiate this arbitrary loss of our unique identity, merely for SDC Planning to massage the figures, and hide the lack of housing development in Sevenoaks town itself. The percentage increase including Fort Halstead and 2 Green Belt sites, must be one of the largest in the district, excluding towns.</p> <p>The local population is increasing whilst infrastructure improvements are lacking. There are two proposals for Dunton Green which will effectively remove a significant part of its ‘Green lung’ (which is surely contrary to all the Plan 2040 objectives claiming to want to improve the health &amp; wellbeing of residents, to protect the environment, etc).</p> <p>Dunton Green development is once again disproportionate to the size of the village, having already increased 50% with Ryewood, moving from c. 950 dwellings to +1500. The Green Belt in Dunton Green is important to the village and DGPC discredits the claim that these areas of Green Belt are poorly performing when they are acting to provide Green lungs, environmental havens and recreational amenity.</p> <p>Dunton Green is a village in its own right. Historically an industrial village, it most certainly is NOT a suburb of Sevenoaks, despite SDC Planning’s attempts to make it look like that.</p>
<p>Plan 2040: 1.Development Strategy</p>	<p>To specifically answer the questions in relation to Development Strategy, Dunton Green Parish Council has the following opinions:</p> <ol style="list-style-type: none"> <li>1. Which is your preferred option? <ol style="list-style-type: none"> <li>a. Option 1 - Baseline plus AONB sites on the edge of settlements</li> <li>b. Option 2 - Baseline plus standalone settlement</li> <li>c. Option 3 - Combined approach of all the above</li> </ol> </li> <li>2. <b><u>None of the above</u></b></li> <li>3. Please explain your answer <p>To accept any of the Options 1 to 3 is to accept inclusion of the sites identified as Baseline sites within Plan 2040. As has been outlined above, Dunton Green Parish Council has serious concerns about development of Green Belt.</p> <p>What is the rationale for the inclusion of the two Green Belt sites in Dunton Green? Presumably, that is answered by Item 1.21 which indicates that the sites are included as potential allocations because they are in ‘poorly performing’ Green Belt areas and close to existing town or service settlements and that these attributes and the pressing need for housing may be sufficient to constitute Exceptional Circumstances! Dunton Green is not a town or a service settlement, despite what SDC has allocated it as in terms of being part of ‘Sevenoaks Urban’.</p> <p>Whilst SDC is under pressure to produce a Plan that meets the housing targets set by Government, why is more not being done to ensure that empty houses are being used to address the shortfall in housing numbers</p> </li> </ol>

	<p>and meet housing needs? Why can't Brownfield sites be exhausted before attention is turned to Green Belt sites?</p> <p>4. Are you aware of any additional sites in existing settlements which have not yet been considered? Whether considered or not, DGPC believes that Brownfield sites should be explored before <u>any</u> development is permitted on Green Belt. Sites such as the following:</p> <ul style="list-style-type: none"> <li>• Technical Treatments, Rye Lane, Dunton Green</li> <li>• Old Farmer pub site, opposite Sevenoaks Station</li> <li>• Old Police station site Sevenoaks</li> <li>• Field north of A25 - in the area of Bradbourne Riding Stables</li> <li>• Otford Site where Covid centre was</li> <li>• Brittain's Common</li> <li>• Gas works</li> <li>• Land behind the recycling centre in Sundridge</li> <li>• Land on the corner of Main Road Sundridge and Dryhill Road map ref 51.280403, 0.141801</li> <li>• Land the other side of Dryhill Lane, map ref 51.279825, 0.143864</li> <li>• Any of the many football/sports pitches at Sevenoaks school.</li> <li>• West Kent water land off Crampton's road, by Travis Perkins at Bat and Ball.</li> </ul> <p>This is now particularly pertinent with news that Housing secretary Michael Gove is planning to finally announce the National Planning Policy Framework (NPPF) - with some key changes to greenbelt housing targets. It is reported widely that local authorities will be given the freedom to set lower housing targets, as well as being allowed to allocate less land to development if it can be argued that more development would require building on greenbelt land, or potentially damage the character of the area</p> <p>Utilisation of empty properties across the District must now be given a higher priority (and be included within the Local Plan aspirations) before turning to development on Green Belt.</p>
Plan 2040: 2.Housing Choice for All	<p>What is the definition or criteria of 'affordable'? Affordability should be measured at parish level, not ward level. Those parishes in combined wards across the District, such as Riverhead and Dunton Green, may be adversely affected if the measure is not directly within the parish.</p> <p>'Affordable' housing on the Ryewood development was not really affordable for anyone living in the village on an average salary. There should be a means by which affordable homes are provided in perpetuity (i.e. that they are not permitted to be sold on the open market, at market value). Community housing schemes should be being promoted more widely to assist with this.</p>
Plan 2040: 3.Employment and Economy	<p>Employment and housing should be hand in hand. Employment opportunities indicated for sites in this consultation are extremely important, to keep employment local, and to assist with any ambitions there are to reduce the burden on the transport infrastructure, with stress on the roads in particular.</p>

	<p>If a proposal indicates that employment is part of a scheme and permission is granted, there should be no circumstances under which this can be changed. Developers should have no rights to argue non=viability and certainly not replace with additional housing. There should be caps on the rental rates that developers might be looking to charge. Can Article 4s be allocated on employment spaces at the point at which planning permission is granted?</p> <p>Developers should be held to account to ensure that any employment opportunities are attractive enough that businesses wish to take them up. A residential scheme to replace any employment generating use that has been granted permission should not be granted permission. The legal agreements drawn up between SDC and the developers should have severe financial penalties if the provision of employment uses promised is not forthcoming.</p>
Plan 2040: 4. Climate Change	
Plan 2040: 5. Design	
Plan 2040: 6. Health and Wellbeing	Dunton Green is already in an Air Quality Monitoring Area. The primary school is on the main road and any proposals that will result in increased traffic volumes will inevitably have a detrimental effect on the village. How does this stack up against proposals to improve the environment?
Plan 2040: 7. Historic Environment	
Plan 2040: 8. Natural Environment	
Plan 2040: 9. Infrastructure	<p>Developer promises are of things that they (and SDC) know are not in their gift - a developer cannot promise a school as it has no authority to say whether one will be built (this is KCC Education); similarly it cannot promise a GP surgery when this is within the hands of the local Clinical Commissioning Group and their assessment of what is required and what is needed. All that happens is that large sums of money are exchanged and those affected see no tangible benefit.</p> <p>SDC can state that it is 'working with partners in health, education, transport, utilities and many other sectors'. How is SDC going to ensure that the development promises made to secure planning permission are actually delivered?</p> <p>Ryewood is a prime example. A medical centre was promised in the proposal, but the West Kent Clinical Commissioning Group couldn't get a GP to take it on, so the money was handed over to the CCG. The area that was to have been a medical centre (along with a proposed small area of commercial use which the developer then claimed was not viable due to lack of demand) ultimately was built as additional dwellings.</p> <p>Money paid to KCC for Education from the Ryewood development has not gone to the school because the S106 wording was too specific about it having to be spent on the provision of additional school places and not principally for the benefit of the Dunton Green primary.</p>
Plan 2040: 10. Transport	The aspiration that the Plan will encourage healthy journeys and low carbon travel are commendable but there does need to be a reality check. People do and will continue to use cars. In trying to address Transport for the future when

	<p>housing schemes are developed, they <b>MUST</b> include adequate provision for parking.</p> <p>Dunton Green's own experience of the Ryewood development is that the woefully inadequate and unrealistic provision of parking is a significant contributory factor to disharmony and angst amongst residents. If a realistic number of parking spaces had been allocated in the first place, we would not see the level of ongoing issues and concern that there is from Ryewood residents. It also affects neighbouring residents when parking is displaced and an area that didn't have an issue develops one.</p> <p>Provision of regular, reliable public transport needs to be addressed now, not just when a new development is constructed. There needs to be a step change in the provision of services so that people know that they can rely on it; until then, it will not be used adequately enough for its provision.</p>
Conclusion	<p>Dunton Green Parish Council cannot support a Plan that has two Green Belt Baseline sites in its boundary. SDC says they are proposed allocations, but there seems no way for them to be removed from the Plan.</p> <p>The Parish Council appreciates the uphill task that SDC has to develop a Plan that meets the Government's high housing targets but is strongly of the opinion that proper utilisation of Brownfield sites, of empty housing and an approach that spreads development more equally around the District would be better.</p>
Site	<b>COMMENTS</b>
<p>HO10</p> <p>Land east of London Road, Dunton Green</p> <p>GREEN BELT</p> <p>HO</p> <p>235 units</p>	<p>Dunton Green Parish Council strongly objects to any Green Belt sites in Dunton Green being included within the Baseline sites of the latest version of Plan 2040. As a principle, Dunton Green Parish Council objects to development within the Green Belt.</p> <p>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land <b><u>permanently open</u></b>. Government policy on protection for the Green Belt is set out in chapter 13 of the National Planning Policy Framework (NPPF), which opens by stating that the Government attaches great importance to Green Belts. On protecting the Green Belt, the NPPF urges Local Planning Authorities (LPAs) <b><u>to maximise the use of suitable brownfield sites</u></b> before considering changes to Green Belt boundaries.</p> <p>The NPPF demands that there should be "exceptional circumstances" before Green Belt boundaries can be changed and says that inappropriate development is harmful to the Green Belt and should be approved only in "very special circumstances".</p> <p>DGPC is of the opinion that there are no circumstances that can justify the development of this Green Belt site. What 'exceptional' or 'very special' circumstances have been identified to warrant the inclusion of this site as a Baseline site within Plan 2040?</p> <p>All Brownfield sites need to be re-evaluated before any development on Green Belt land can be permitted.</p>

The SHELAA Stage 2 Assessment of this site is misleading. We have highlighted below only some of the queries:

**Existing Use - Yes (but will be reprovided)**

*What does this actually mean? How can you reprovide Green Belt once you have built on it?*

**Green Belt - 99.63% within Green Belt**

*How have you calculated that 0.37% of the land is not in Green Belt? And why does this then warrant only an Amber classification, not a red classification?*

**Flood Risk - Flood Zone 1**

*This parcel of land does flood (we have video footage of flood water especially by the station underpass) and far from a green allocation, this should be amber at best.*

**SSSI Impact Zone - Requires consultation**

*What parameters are SDC using to establish whether consultation is required or not?*

**Settlement Classification - Within 400m of Sevenoaks**

*What calculations are being used to put sites in Dunton Green within 400m of Sevenoaks This site is wholly within Dunton Green and some distance from Sevenoaks.*

**Town and Local Centres - Access point within 800m of Dunton Green, Access point within 2km of Riverhead**

*Again, what measurements are being used? This parcel of land is in central Dunton Green, well within the boundary of Dunton Green? Dunton Green is NOT a suburb of Sevenoaks Town.*

**Conclusions - Suitability**

*SDC has determined because this area of Dunton Green lies within its self-appointed planning area of 'Sevenoaks Urban' that this site is a Principal Town site. It is not. It is a site central to the village of Dunton Green. Dunton Green PC objects to the Settlement Hierarchy and SDC's determination to urbanise further the village of Dunton Green.*

**'The site lies fully within the Green Belt, however, forms part of a whole Green Belt parcel recommended for release through the Stage 2 Green Belt assessment'.**

*100% in Green Belt and yet earlier in the document it states 99.637%? If the figures relate to a slightly different parcel of land, how can they be used (and why is there no plan of the overall site)? What was the whole Green Belt parcel that was recommended for release if this site does not form it in its entirety?*

**'The site does not currently have a vehicular access and so a new access would need to be provided, as well as a secondary access for emergency use.'**

*Just where do you think that secondary access is going to be positioned? It is impossible to access through the recreation ground and its access road. This lack of access provision makes this site unsuitable for development. This site should not be included in the Baseline sites (which to all intents & purposes mean that SDC has allocated the site regardless of Dunton Green's concerns).*

<p>H08</p> <p>Pounsley House, Pounsley Road, Dunton Green GREENBELT</p> <p>HO</p> <p>7 units</p>	<p>As a principle, Dunton Green Parish Council objects to development within the Green Belt.</p> <p>Dunton Green Parish Council strongly objects to any Green Belt sites in Dunton Green being included within the Baseline sites of the latest version of Plan 2040.</p> <p>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land <b><u>permanently open</u></b>. Government policy on protection for the Green Belt is set out in chapter 13 of the National Planning Policy Framework (NPPF), which opens by stating that the Government attaches great importance to Green Belts. On protecting the Green Belt, the NPPF urges Local Planning Authorities (LPAs) <b><u>to maximise the use of suitable brownfield sites</u></b> before considering changes to Green Belt boundaries.</p> <p>The NPPF demands that there should be “exceptional circumstances” before Green Belt boundaries can be changed and says that inappropriate development is harmful to the Green Belt and should be approved only in “very special circumstances”.</p> <p>DGPC is of the opinion that there are no circumstances that can justify the development of this Green Belt site, particularly with its close proximity to the Sevenoaks Wildlife Reserve and the unique character (and historical importance) of this area of Pounsley Road. What ‘exceptional’ or ‘very special’ circumstances have been identified to warrant the inclusion of this site as a Baseline site within Plan 2040?</p> <p>Sevenoaks Wildlife Reserve is a nationally important nature reserve and Site of Special Scientific Interest (SSSI), with over two thousand species recorded. Dunton Green is also now officially recognised by the Environment Agency as having a colony of very rare White clawed Crayfish in its chalk water streams. A development on this land, in such close proximity to these nationally important sites is concerning.</p> <p>The SHELAA Stage 2 Assessment of this site is misleading. We have highlighted below only some of the queries:</p> <p><b><u>Land Use (GF/PDL) - Mixed - green field and previously developed</u></b></p> <p><i>Developed because there is a house on part of the plot?</i></p> <p><b><u>Existing Use - Yes but will be reprovided</u></b></p> <p><i>What does this actually mean? How can you reprovide Green Belt once you have built on it?</i></p> <p><b><u>Flood Risk - 24.05% in Flood Zone 2 and 18.53% in Flood Zone 3</u></b></p> <p><i>Is this not a red light to development?</i></p> <p><b><u>Site of Special Scientific Interest (SSSI) - Not within an SSSI</u></b></p> <p><i>No, it is not within it, but it is in very close proximity to one</i></p> <p><b><u>SSSI Impact Zone - No risk</u></b></p>
--	---

*There is surely some risk that any development on that site could contaminate waters that affect the Wildlife Reserve and the waterway? Why does this not require consultation?*

**Local Nature Reserve - Not within an LNR**

*Again, technically not but in very close proximity to one and potentially impacting on that LNR*

**Air Quality - Air Quality Assessment, impact on A25 AQMA (traffic will need to go through AQMA)**

*No mention of any impact on the A224 London Road where there are also concerns about Air Quality and which traffic will travel on before reaching the A25?*

**Site Access - Existing access (contributions towards improvements may still be sought)**

*Access to the site (and all of this area of Pounsley Road) is accessible only by a single-track private road. What improvements can be made (the road cannot be widened)?*

**Settlement Classification - 100% within 400m of Sevenoaks**

*? What calculations are being used to put sites in Dunton Green within 400m of Sevenoaks*

**Town and Local Centres - Access point within 800m of Dunton Green, Access point within 2km of Riverhead**

*Again, what measurements are being used? Pounsley Road lies squarely within the boundary of Dunton Green?*

**Conclusions - Suitability**

*SDC has determined because this area of Dunton Green lies within its self-appointed planning area of 'Sevenoaks Urban' that this site is a Principal Town site. It is not. It is a site within the village of Dunton Green. Dunton Green PC objects to the Settlement Hierarchy and SDC's determination to urbanise further the village of Dunton Green.*

*The access to the site is restricted. The fact that the site is within a Mineral Safeguarding Area, an area of allocated Open Space and the Green Belt seems to have largely been ignored. Heavier weighting has been given to the fact that the site is close to the boundary between Dunton Green and Sevenoaks Town than anything else?*

*Pounsley Road has a unique character, with its historical miners' cottages and 'hamlet' feel. Further development in this area will add more pressure to an area where parking is already extremely limited and have a detrimental effect its unique character. A suite of seven new homes (where there are fewer than 25 homes) in this area is not suitable at all.*

*This site should not be included in the Baseline sites (which to all intents & purposes mean that SDC has allocated the site regardless of Dunton Green's concerns).*