

Kemsing Parish Council

Response to the Local Plan Consultation Reg 18

27 November 2025

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1. Policies

Policy ST1 (A Balanced Strategy for Growth):

Question 1 – (c) None of the above

Question 2 – Kemsing Parish Council does not consider the Plan to deliver a balanced strategy for ‘good growth’.

Question 3 - No

General comments on the Local Plan Consultation:

The Parish Council reviewed the Sevenoaks District Council (SDC) Local Plan Regulation 18 proposal, together with all the supplementary documents.

- We are disappointed with the timing of the consultation.
- SDC is well aware that this is a very busy time for Parish and Town Councils when considering budgets.
- The public was informed that response forms to the consultation would be available from Parish and Town Councils, as well as Libraries, yet there was no communication from SDC conveying this information to Parish and Town Councils before the public consultation opened. Upon enquiring, our Parish Council Clerk was informed that Parish and Town Councils as well as Libraries were expected to print the response forms at their own expense.
- It was disappointing to note that preserving the Green Belt areas was not highlighted as an objective within the District Council’s Spatial Vision. Under these circumstances, can SDC clarify its current policy on Green Belt development?
- It was disappointing that Kemsing had not been made aware of the significant number of Kemsing sites included in the Local Plan, and the reclassification of Green Belt as Grey Belt, prior to the documents being made available for consideration at the District Council’s Development and Infrastructure Advisory Committee meeting on 23 September 2025. It is disappointing that many of the Evidence Base documents, and in particular the document (Green Belt Assessment) affecting Kemsing the most, was only published on the day the consultation opened. Kemsing Parish Council would like to point out that, in our view, the democratic process was not followed.

Table 1 – Vision and Objectives:

Page 31 (Vision 5) – The 50% requirement for affordable homes contained within this document is apparently undermined by the option for developers to make CIL or S106 payments instead. If some developers do, how will the shortfall in affordable housing be made up?

Affordable Housing Definition:

What proportion of the Option 1 and Option 2 housing proposals are

- a) Social Rented
- b) Affordable Rented
- c) Intermediate housing (between social and market rents, i.e. greater than 80% of market rent, but smaller than 100% of market rent).

In the document set, a=80%, b=20%. Why is there no mention of c? Is any category c housing counted in the Plan’s Affordable Housing target?

Development Strategy Options for suitable sites:

The potential identified through discussions with neighbouring authorities – the current status is that “this is to be confirmed.” Can SDC confirm that conversations with neighbouring authorities have taken place as it would seem that this could potentially help with meeting the required number of new homes.

Green Belt/Grey Belt

We have grave concerns regarding Sevenoaks District Council’s recent reclassification of Kemsing’s Green Belt areas as Grey Belt areas. As mentioned before, Kemsing Parish Council had no prior knowledge of this assessment taking place. Given the substantial impact on our village, we would have expected Sevenoaks District Council to have alerted Parish Councillors (and local residents) to this significant change as soon as possible.

It is disappointing that we have only been allowed access to the Grey Belt assessment documents (dated 10 October 2025), when they were published on the District Council’s website on 23 October 2025 when the public consultation opened.

Prior to this date, there had been no indication of this new Grey Belt classification affecting our village in such a significant manner, nor has there been any maps on the District Council’s website showing the proposed/agreed changes to Grey Belt areas. As far as we determined, the interactive maps had not been updated accordingly.

The National Planning Policy Framework (December 2024), states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced, one of which is where a Local Authority cannot meet its housing needs. The NPPF states that this can only happen through evidence of an examination of the strategic policy. Again, the Parish Council would have expected early engagement from the District Council given the severe impact on the Green Belt surrounding our village.

We have noted that the Green/Grey Belt Assessments refer to Kemsing as a ‘town.’ Please can SDC explain why this is?

The growth strategy focuses on three aspects, one of which we do not believe to apply to Kemsing: “Poorly performing Green Belt, now known as Grey Belt (adjacent to a higher tier settlement or train station).”

Kemsing Parish Council has a policy of no development in the Green Belt that surrounds our village. We still strongly believe this policy is appropriate for the local community. This policy has been maintained for over 45 years but has resulted in significant infilling within the village boundary. Since 1981 there have been no major infrastructure improvements in Kemsing. Since then, more than 250 homes have been added during this period, and are putting a strain on the community infrastructure, such as water supply, drainage, sewerage and roads.

We strongly oppose the District Council’s reclassification of Green Belt areas in Kemsing as Grey Belt.

Traffic & Transport

Kemsing is one of the largest villages in the Sevenoaks District and is uniquely constrained by very limited access and egress, with the main arterial routes being Pilgrims Way, Childsbridge Lane and Noah’s Ark. The additional traffic movements caused by the proposed developments in this Local Plan collectively, will exacerbate the already congested access roads.

Kemsing Parish Council is also concerned about road safety, and as such, we are currently considering measures to improve safety across Kemsing. For example, working with Kent County Council Highways and Transportation, we have recently successfully identified measures to improve safety at the junction with St. Edith Road and High Street and have actively sought the installation of double yellow lines in this area. We are continuing to look at different areas within our community where improvements can be made.

When Pilgrims Way was closed recently, it was taking up to one and a half hours to reach the A25 from the end of the queue. The potential addition of another 800 cars (probably a low estimate if all 373 proposed houses were to be built), would make leaving the village an unreasonable proposition. Allied to the above, emergency vehicles would have difficulty entering and leaving the village.

The Noah's Ark traffic joins with the Childsbridge Lane traffic to exit onto the A25. Further, under the A – F classification of roads, the A25 at Seal is labelled E, meaning it is already considered inadequate. Extra traffic will only make it worse.

The plan should take into account the access from Childsbridge Lane to the new estate planned for the Bat and Ball area (old Quarry). In principle, Kemsing Parish Council is not averse to more houses being built but to the sheer number.

Settlement Hierarchy:

Kemsing was classified as a Secondary Service Settlement. During the Settlement Hierarchy process, the Parish Council had challenged Sevenoaks District Council to several inaccuracies within the document. We are disappointed that none of our proposals had been incorporated, despite having raised questions with the Planning Department.

Kemsing Housing Needs Survey:

The survey was conducted in December 2024. Only 43 responses were received. In our view this does not accurately reflect the need in Kemsing on all aspects of the questionnaire.

Individual Site Assessments:

Kemsing Parish Council strongly opposes the assessment to view sites in isolation. The implications of the proposed six developments in Kemsing cannot be assessed in isolation. They should be assessed as a whole to be able to fully determine the real impact on Kemsing's current fragile infrastructure. Furthermore, it is our strong view that it is not only the development of the proposed six Kemsing sites that should be taken into consideration, but also the already approved Quarry scheme as well as the Otford proposals.

All of these schemes combined will have an adverse impact on the infrastructure, including drainage, road network, education and health care facilities. Existing footpaths regularly used by residents on the proposed development sites, should be protected.

Rural Designated Areas:

Why has part of the West of Kemsing been designated as a non-designated Rural Area? We have noted that in the Designated Rural Areas, (as defined under Section 157 of the Housing Act 1985), lower thresholds apply in accordance with National Policy. This would apply to sites KEM3 and KEM4.

Sustainability Appraisal of Sevenoaks District Council Local Plan Interim Report

The Report is dated October 2025.

Paragraph 5.4.73 – Kemsing was classified as a village in 2023 and there were no SHELAA sites. There are now 5 SHELAA supported sites in Kemsing for 373 homes with one urban site (KEM1) – Land West of Park Lane.

The document states that there may be an opportunity to “complete” the expansion of Kemsing to its “natural” boundaries, whilst acknowledging that it cannot be confirmed at the current time that any such realistic options for comprehensive growth exists. Why then are these sites included now? Why doesn't the SHELAA document state this explicitly?

Yet, compared with Seal, it clearly states that Seal benefits from a close link to Sevenoaks, and that the possibility of consolidating the built form between Seal and Sevenoaks could be feasibly explored. There are at the current time, no SHELAA supported sites in Seal.

Paragraph 5.4.78 – Although it is acknowledged in this document that there is only one reasonable scenario involving SHELAA supported sites for 373 homes in Kemsing, and that despite this representing a high growth strategy for a fourth tier settlement, it states that *“Kemsing has reasonable transport and accessibility credentials, and that most of the proposed sites appear to be performing well when viewed in isolation, with potential opportunities to deliver benefits to the existing community”*.

This is not true. Kemsing station is a rural station some mile and a half from the largest proposed site and even further from the nearest to Seal. The bus service is infrequent.

We urge Sevenoaks District Council to take serious note of the inaccuracies in this report;

There are no 'reasonable' transport and accessibility credentials which will be able to support the traffic to be generated from the number of additional homes – please provide evidence of this statement.

There are no buses to Otford and the rail provision for Kemsing is poor. Not everyone is capable of walking to Otford station, and the path is dark and isolated and not safe to walk in the dark. We have objected to the classification of Noah's Ark as a "hamlet." SDC has not taken notice of this objection.

Noah's Ark was classified as not performing well in transport and accessibility terms as well as a potential development creep.

Paragraph 5.4.105 – States that there is a clear transport and accessibility case for limiting growth. Again, as stated before, it is imperative that the sites are not being looked at in isolation.

Paragraph 7.2.4 – Smaller settlements: it is not necessarily the case that any concerns from a transport and accessibility perspective translate into concern from an air quality perspective. Yet it states that "there is a need for further scrutiny of the proposal to direct a considerable amount of growth to lower tier settlements."

Paragraph 5.4 – To ensure a strategic focus on maximising benefits to the local community. In terms of historic nature of villages, high growth supported is limited to the historic constraint, assuming potential to buffer and avoid problematic traffic through the historic core.

Infrastructure Delivery Plan October 2024 Statement:

Relating to Kemsing, the plan states: GP specific impact to be further assessed and considered. When will this take place?

Summary:

In principle, Kemsing Parish Council is in general not opposed to an acceptable level of development in Kemsing. We do however, object in the strongest possible terms, to the number of houses proposed on the six sites in Kemsing (KEM1-5 and NOA1). Compared to Seal, Otford, West Kingsdown and Eynsford, Kemsing has been significantly impacted by the number of sites and number of new proposed houses. The proposals, as set out in the Local Plan, will result in the loss of our village character, adversely impacts the Green Belt surrounding the village, have a detrimental effect on the current infrastructure, drainage, road network as well as our already overburdened health care facilities.

Policy ST2 (Housing and Mixed-Use Allocations):

We noted the site NOA1 with 40 proposed units are included in this policy. We noted that this site has not had a Development Brief prepared for this Regulation 18 Consultation, and that therefore, the figure of 40 homes may be subject to change. Can SDC please advise when the Brief will be made available?

Policy H1 (Housing Mix):

We welcome the requirement that new homes should meet M4(2) standard for accessible and adaptable homes. It is encouraging to note that 5% of homes should meet the M4(3) wheelchair accessibility criteria.

Policy H2 (Provision of Affordable Housing):

Kemsing's Housing Survey dated December 2024 indicated a need for 30 affordable homes in Kemsing. It is unclear as to the level of involvement from Kemsing Parish Council and our input into the selection process to ensure that these affordable homes are available for people with local connections to Kemsing. Please can SDC advise?

We understand that the need of villages with a high need which cannot be met, can be met by developments in neighbouring villages.

Paragraph 9 :*"In accordance with national guidance, viability assessments will not be accepted on Grey Belt sites for the purpose of reducing developer contributions including affordable housing"* – What does this mean?

Paragraph 11: *"If it can be demonstrated that the full affordable housing requirement is not viable and the Council agrees, a viability review is required upon first occupation or an alternative agreed trigger point. This is to ensure that any uplift in the development value of the scheme is shared and contributes to the affordable housing provision, whether this be an on-site or off-site financial contribution."* - Can SDC confirm what constitutes an off-site financial contribution? How does this then relate to the 'Golden Rules for Grey Belt and Social Value' Statement?

Page 80 – Affordable Housing Provision:

Paragraph 2.12 – No mention of intermediate housing option. Why?

Page 80 – Grey Belt 'Golden Rules':

Are any of the identified 'affordable homes' intermediate housing? (£1 under market rent would classify these homes as 'affordable housing' under the category of intermediate rents).

Page 82 – Affordable Housing Contributions Thresholds 2:

Regarding the table, what is the definition of "Major"? What about Grey belt sites not defined as "Major"?

Page 83, Paragraphs 5 - 14:

What happens to the financial contribution paid in lieu of affordable housing when it can be demonstrated that affordable housing is unviable on the site, and how does the financial contribution assist those seeking affordable housing? What links the two?

Policy H3 (Housing in Rural Areas):

There are no specifics given on when site options appraisals will be carried out.

Paragraph 2: "The Council expects rural exception housing schemes to provide 100% local needs housing to meet identified needs. However, if it can be demonstrated that a local needs housing scheme is not viable or deliverable, and the Council agrees, an element of market housing may be permitted." Where and how will this be evidenced? How will local Parish Councils have any input?

Paragraph 1(b) of this policy would indicate that if a local need cannot be met through the development of non-Green Belt sites within the parish, it could be met by the adjacent parish. We noted that the Housing Needs Survey dated November 2022 in our neighbouring village in Seal, showed a need for eight affordable homes in Seal. Given that there are no proposed sites within the Local Plan for any development in Seal, how will this need be satisfied? Can we expect that Kemsing will have to meet Seal's need within the six sites proposed in Kemsing? Or can Kemsing's requirements be met by the already approved Quarry development?

Paragraph 2.16 – We see examples of planning conditions attached to rural housing provision (for example, for agricultural workers only) being challenged and overturned, and, where owners evidence that there are no occupiers or purchasers for such properties, the restriction is lifted. How is "in perpetuity" in this context, protected?

Policy H4 (Housing for Older People):

Kemsing's Housing Need Survey dated December 2024 shows a need for 2 homes for older people in Kemsing. How will we make sure that is this available for Kemsing residents?

Paragraph 2.19 – This is disingenuous. The Government have increased the age at which pensions are available, ramping up to 67 by 2042, and it is planned to rise to 68 after 2044. This means that SDC's now arbitrary statement using "residents aged 65 and over" should be adjusted taking into account those aged 66 and 67 over the lifespan of this plan. SDC is applying out of date criteria to support its statistics relating to housing requirements for "older people," which is intended, surely, to be separate from the category of "working-age people." The "housing required" numbers are therefore artificially inflated by misrepresentation. In addition, people are living longer but also maintaining active lifestyles into older age when compared to current demographics.

Policy H5 (Build to Rent):

We noted that these apply to built-up areas in Sevenoaks, Swanley and Edenbridge.

Policy H6 (Smaller Sites):

This has been noted, and we welcome a policy to provide good quality homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, contributing to the Council's commitment to tackle the challenge of climate change.

Housing Density and Intensification:

2.36 – Kemsing Parish Council will not support and is concerned that it allows for up to four to six storey buildings. We would consider this to be up to two storeys as a maximum.

There should be control measures or mitigation regarding the density on "up and out" building designs.

Policy H7 (Housing Density and Intensification):

We are concerned with the policy and density proposed.

Who will determine whether the proposals have detrimental impacts on the local character or amenity?

Densities of over 150 dwellings per hectare sounds excessive.

Furthermore, the net density excludes the public open space.

How large will the communal spaces be? Where are the guidelines?

Policy H8 (Self-build and Custom Housebuilding):

We agree with flexibility with self-built but within reason and in accordance with the Self-Build and Custom Housebuilding Act 2015.

We could not locate the Self-Built and Custom Housing Building Action Plan?

Policy GT1 (Provision for Gypsy and Traveller Community):

No comment.

Policy GT2 (Gypsy and Traveller and Travelling Show person Accommodation):

We have noted that not all Gypsy and Traveller pitches will be delivered through the Local Plan Allocations, and that further sites will be identified ahead of the Regulations 19 consultation.

Policy EMP1 (Delivering Economic Success):

With reference to 1(b) – is there a demand? Where has this been evidenced?

Policy EMP2 (New Development Land):

We are concerned that the Council will support proposals for new employment land in the Green Belt, whilst appropriate buildings may already exist in town centres where there are empty shops.

Paragraph 2(e) – "*Have no unacceptable impact on highways, access and parking*". Any new office building/retail will have an increase in vehicle movement and thus have an adverse impact on the local community transport and exacerbate already gridlocked roads.

Policy EMP3 (Retaining and Optimising Existing Employment Land):

No comment.

Policy EMP4 (Rural Diversification):

3.17 – Impact on highways for local residents. The Policy lacks to demonstrate what other sustainable modes of transport are proposed to make this viable.

Open Spaces – Kemsing Downs Nature Reserve has not been mentioned?

Policy EMP5 (Tourism and the Visitor Economy):

No comment.

Policy TLC1 (Resilient Town and Local Centres):

We welcome that Sevenoaks District Council will resist the loss of shops and services where they are serving a local need, but how will this need be assessed?

Policy SEV1 (Sevenoaks Town Centre):

No comment.

Policy SWN1 (Swanley Town Centre):

No comment.

Policy EDN1 (Edenbridge Town Centre):

No comment.

Policy WST1 (Westerham Town Centre):

No comment.

Policy NAG1 (New Ash Green Town Centre):

No comment.

Policy CC1 (Mitigating and Adapting to the Impacts of Climate Change):

No comment.

Policy CC2 (Sustainable Design and Construction):

No comment.

Policy CC3 (Low Carbon and Renewable Energy):

No comment.

Policy CC4 (Tree Planting):

Paragraph 1 & 2 – What are the alternatives if it can be demonstrated that one new tree for every 500 square metres of new floor space is not practicable due to the site constraints?

Paragraph 1 – Given the densities of housing SDC requires, is it not inevitable that the tree planting ratio stated in the policy will be unachievable. What measures have SDC set to ensure that alternative tree planting in other locations, but within the locality boundary, will be completed? Trees also contributes to improve air quality.

Policy W1 (Flood Risk):

The existing drainage infrastructure is already inadequate and cannot meet the existing demand successfully.

Paragraph 4.31 – Why, in this paragraph, is there no mention of the rare chalk stream, known locally as Guzzlebrook, one of only 200 chalk streams in the world, which runs through part of Kemsing? Surely this is worth mentioning and celebrating? It has been brought to SDC's Planning Department's attention multiple times in the public comments relating to planning application SE/25/00697/FUL (The Laurels, Greenlands Road, Kemsing).

Policy W2 (Surface Water Management):

Kemsing Parish Council urges Sevenoaks District Council to ensure upgrades are made and no surface water is discharged in local streams or watercourses.

Paragraph 2 – Is this SDC’s policy as yet? We have seen planning application for developments where, in the absence of other methods of dealing with surface water run-off, the developer identifies discharge into the foul sewer as the only possible option. If this is policy, why is the application not rejected at an early stage? For example, see SE/25/00697/FUL (The Laurels, Greenlands Road, Kemsing).

Paragraph 3 - The Parish Council agrees with the statement that the discharge of surface water runoff into a foul-only sewer should not be permitted.

Kemsing has a rare chalk stream – see our comments above (Policy W1).

Policy W3 (Water Supply and Quality):

Paragraph 3 - How will Sevenoaks District Council ensure that water consumption is no greater than 110l per person per day? This seems unattainable.

Policy DE1 (Community Review Panel):

When will this panel be appointed and what is the selection process/criteria?

Will this be a different group of people for each application? Or a formal group who will comment on all applications within the SDC area? Given that many Parish Councils have Councillor vacancies and find it hard to find committed volunteers, where does SDC think the (presumably voluntary) CRP post holders will come from? Will they be expected to meet with stakeholder groups, for example, local residents opposed to a development, environmentalists, etc? Lastly, is this envisaged to replace public objections in the planning process, to try to overcome “nimby” objections?

Policy DE2 (Design and Advisory Panel):

Has the Design and Advisory Panel been appointed?

Policy DE3 (Ensuring Design Quality):

No comment.

Policy DE4 (Delivering Design Quality):

No comment.

Policy DE5 (Outline Planning Application):

We welcome the mandatory Design Principles document.

Policy DE6 (Design Codes):

We welcome the Design Codes guidelines.

Policy HW1 – Health and Wellbeing

Access for local residents to open spaces is of utmost importance and non-negotiable.

Paragraph 2(a) – Although within walking distance, the services of the Otford Medical Practice (also serving Kemsing), is already severely overloaded.

An additional 371 plus homes in Kemsing, coupled with the 220 proposed homes in Otford, will result in an unattainable situation for the provision of adequate health care, including dentistry services, for all and would lead to increased health inequalities. The existing health care system (locally and nationally) is already overburdened. This will have an unacceptable negative impact on residents’ health and wellbeing.

Policy HW2 (Hot Food Take Away and Fast Food, and Evening Economy):

No comment.

Policy HW3 (Environmental Nuisance and Pollution):

The policy refers to proposals resulting in unacceptable levels of light and that under these circumstances, there should be (b)*by ensuring that the development does not contribute to and avoids areas where occupiers of the development would be subject to excessive light pollution* and

(c) ensuring that development would not result in acceptable light pollution which cannot be adequately mitigated.”

Sevenoaks District Council is reminded that existing Kemsing residents currently enjoy uniquely dark skies for the area as a result of the lack of street lighting throughout the village and that this deserves to be safeguarded against any form of development that would create excessive light pollution.

Policy AQ1 (Air Quality):

It is reassuring that Sevenoaks District Council will require that an Air Quality Impact Assessment for all major housing developments of 10 units or more, but why is this not implemented for all housing, regardless of the number of houses proposed?

We noted that four Air Quality Management Areas in relation to traffic emissions were revoked following Member agreement, as they were compliant for at least five years. Would this assessment not have been significantly impacted by the Covid pandemic, and particularly during lock down, and the period thereafter, and would less vehicle movement as a result, not have had a significant impact on the Air Quality Assessment? Now that everything has gone back to normal, shouldn't this Assessment be taken again.

Sevenoaks District Council decommissioned two automatic monitoring stations in 2024, which means that they are now only able to report on nitrogen dioxide concentrations. Was this result below annual mean AQS objectives because of reduced use of cars during the pandemic? We noted that the maximum findings were concentrated on Seal Road.

There are four Declared Areas. What about existing undeclared areas? The increased traffic from the proposed six sites in Kemsing would have a detrimental impact on the A25, coupled with the already approved Quarry development in close proximity.

A25 in Seal – we noted that further work is necessary to identify future transport challenges and inform decision making. How can this not have been done already?

It is noted that no funding has been secured for future Assessments, because the costs are likely to be significant (page 12).

Page 21 – There is clear evidence that PM2.5 (particulate matter smaller than 2.5 micrometres) has significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases. It would appear that no monitoring of PM2.5 is currently being conducted in the District. The decommissioning of the two automatic monitoring sites also meant that no monitoring of PM10 has taken place either; which means that Sevenoaks District Council cannot calculate PM2.5 concentrations as has been done previously. There has been a lengthy and costly decommissioning process of automatic monitoring stations.

The document (Air Quality Annual Status Report dated June 2025) states that Sevenoaks District Council purchased a real time monitor in 2024 and “*will look to purchase a further three in early 2025 to be deployed across the District*”. We are confused as to why the June 2025 document has not been updated to reflect whether the additional three units have been purchased and implemented.

The absence of a PM2.5 monitoring in 2024 has resulted in a temporary gap in data collection.

Appendix C: Additional sites impacting by Air Quality.

Paragraph 3.1 – We noted that more information will be provided in next year's ASR (Air Quality Annual Status Report).

The document states that there are concerns about the accuracy of the December 2024 monitoring.

Air Quality Action Plan 2022-2027 (published in April 2022) - has this been updated to take the above into account? On page 208, reference was made to the Air Quality Strategy document. Where can this document be found?

Paragraph 6.2.2 – We could find any mention of the Annual Status report to say this is not included.

Policy HEN1 (Protecting and Enhancing the Historic Environment):

No comment.

Policy HEN2 (Sensitively Managing Change in the Historic Environment):

No comment.

Policy HEN3 (Archaeology):

No comment.

Policy HEN4 (Locally Listed Buildings and Assets):

No comment.

Policy HEN5 (Responding to Climate Change in the Historic Environment):

No comment.

Policy HEN6 (Shopfronts):

No comment.

Policy HEN7 (Historic Parks and Gardens):

No comment.

Policy NE1 (Landscape and National Landscape):

It is disappointing that the National Landscape Designation does not prevent development. Any form of building or development in the setting of any National Landscapes will adversely affect the traditional landscape character, including views, outlook, aspect as well as wildlife and biodiversity.

Policy BW1 (Safeguarding Places for Wildlife and Nature):

The Parish Council strongly encourages no development should take place on sites containing existing Blue-Green Infrastructure.

We would welcome the creation of new designated biodiversity sites.

Policy AF1 (Ashdown Forest):

It is reassuring that development impact on the Ashdown Forest will be closely monitored through a Site-specific Habitat Regulations Assessment.

Policy BW2 (Biodiversity in Development):

We note the pressures on Kent as a whole, due to its strategic location.

We agree that delivery of off-site habitat compensation within the Sevenoaks District should be prioritised.

We note that SDC is currently awaiting the LNRS (Local Nature Recovery Strategy) from KCC, but until it is published, where off-site BNG is required, it should be directed to existing known areas for enhancement. This underpins the necessity in Policy BW1 to create new biodiversity habitats in the District, probably in the Green Belt!

Secondly, it further **confirms the importance of protecting the Green Belt against development, and questions the recent reclassification of all Green Belt areas in Kemsing as Grey Belt.**

Although reference was made in the policy to long term funding/monitoring, this has not been fully described here.

Policy IN1 (Infrastructure Delivery):

We welcome the policy which highlights that significant investment in infrastructure is required to meet the needs of our communities. The main areas are utilities and transport infrastructure improvements, as well as education and health care services. We noted that the Infrastructure Delivery Plan setting out the infrastructure projects needed, and it is reassuring that the document will be updated periodically.

What does this statement mean? : *"The current CIL charging schedule was adopted in 2014 but is in the process of being reviewed to ensure that it aligns with this Local Plan"*. When will there be a consultation and when will the changes be published?

Policy OS2 (Children and Young People's Play Space):

We agree with the policy to include provision for children and young people's place space.

Policy ED1 (Education):

We agree with this policy to provide provision for sufficient school places, and we agree that there is a need for a new secondary school in the District.

Policy SL1 (Sport and Leisure Facilities):

We agree with this policy, in particular, that any redevelopment of sports and leisure provision must prioritise other sport and leisure uses in the first instance.

Policy COM1 (Retention of Community Uses):

We agree with this policy.

Policy COM2 (Allocations for Community Use):

We noted that the Site Ref KEM5 proposes a mixed use (tbc). Are there any further details on this please? Kemsing has three community buildings, and a fourth (the local Church Hall) which will be completed soon. Where is the evidence of the need for another?

Policy UD1 (Utilities and Digital Infrastructure):

We agree with this policy, but we are concerned with the lack of information of how this will be monitored, and what the consequences are if this expansion or improvement are not carried out.

Policy T1 (Sustainable Movement Network):

We agree.

Policy T2 (Sustainable Movement):

We agree.

Policy T3 (Vehicle Parking):

We agree.

Policy T4 (Transport Statements, Assessment and Plans):

Existing traffic problems identified by local Councils and residents should take high priority. They know their local areas and the state of the road network, including parking.

Will Section 106 obligations always address the traffic impact on the local community?

Paragraph 10.25 – What is the timeline on KCC's adoption of the KCC Guidance on Transport Statements and Assessment and Plans in 2025? It seems that this document is critical to the Local Plan and assessments of impact of new developments on the already overloaded road network.

2. Sites in Kemsing

KEM1 – Land West of Park Lane (5) – HO/25/00013):

The proposed access is through a narrow drive leading to the 34 garages currently serving the Moat Housing flats to the rear. Park Lane is already congested on the West side by parked cars for the length of the road from this access entrance to the bottom of the road due to the lack of available off-street parking. The additional traffic movements caused by this development will exacerbate the already congested access roads. We have identified measures to improve safety at the junction with St. Edith Road and High Street and are actively seeking the installation of double yellow lines in this area. This development will result in additional vehicle movements which will increase the risk of accidents.

The village school in Kemsing takes in one class each year; 30 pupils. From census records the average number of four years olds is about 50. The two neighbouring village schools are two class entries and often take children from the village. Some years the village school is unable to satisfy the intake requests from villagers which cause local issues.

The proposal will have a detrimental impact on the adjacent Kemsing Conservation Area and Green Belt. The proposal will create an additional burden on the already overstretched medical and healthcare facilities in Kemsing as well as the drainage and sewerage infrastructure.

Kemsing Parish Council recommends this site is unsuitable for development and should be removed from the Local Plan.

KEM2 – Land South side of West End (7) – HO/21/00120:

The site was an overgrown field until the recent removal of the trees and shrubs. The access onto the West End is opposite a junction (Copperfields) and on a blind bend on a hill. The Local Plan states that the site benefits from an existing access off West End. The proposed access is across a footpath extensively used by pedestrians and is the main route to the local Primary School, Dr. Surgery, local shops and amenities as well as the Church and the village hall. An access way serving 7 new properties and the vehicle movements generated by this proposal, will create serious safety concerns.

Medium Landscape Sensitivity – despite this classification, the entire site has been cleared recently and all trees felled. The Parish Council is concerned about the detrimental impact on wildlife as a result and the adverse effect on the Countryside as a result.

The proposal will detract from the openness of the Green Belt with the views to the South. We fundamentally disagree with the Grey Belt reclassification for this site. The Assessment states that the sub area is not located at the edge of a large built-up area, in physical or perceptual term and therefore does not meet purpose (a). Kemsing Parish Council urges SDC to reconsider this assessment. It is extremely clear that this site is at the edge of a larger built-up area, particularly to the north, but also to the east and west, where there is a large number of existing houses.

The village school in Kemsing takes in one class each year; 30 pupils. From census records the average number of four years olds is about 50. The two neighbouring village schools are two class entries and often take children from the village. Some years the village school is unable to satisfy the intake requests from villagers which cause local issues.

The proposal will create an additional burden on the already overstretched medical and healthcare facilities in Kemsing as well as the drainage and sewerage infrastructure.

Kemsing Parish Council recommends this site is unsuitable for development and should be removed from the Local Plan.

KEM3 – Land at Childsbridge Lane (20) – H/25/00020:

The proposed access is onto a busy main route into and out of Kemsing where there are already parked cars from the existing properties on the road due to a lack of off-road parking. Coupled with the KEM04 proposal the additional traffic movements generated from this site will exacerbate the already congested roads.

With regards to the Green/Grey Belt assessment and purpose (a) – the Parish Council disagrees with the assessment which states that the site is not on the edge of a large built-up area. We noted that a site visit was not possible and that the evidence is purely reliant on an aerial photograph. The assessment mentions Seal as an historic “town” (should be village). The proposal would extend the settlement beyond the limits of the existing settlement edge and the M26 motorway is considered the only barrier between the two villages for it not to merge.

As such it would not meet the NPPF definition as Grey Belt. Why then has this still been included in the Plan and identified as Grey Belt? The rural character of the landscape has clearly not been taken into account.

The village school in Kemsing takes in one class each year; 30 pupils. From census records the average number of four years olds is about 50. The two neighbouring village schools are two class entries and often take children from the village. Some years the village school is unable to satisfy the intake requests from villagers which cause local issues.

The proposal will create an additional burden on the already overstretched medical and healthcare facilities in Kemsing as well as the drainage and sewerage infrastructure.

Kemsing Parish Council recommends this site is unsuitable for development and should be removed from the Local Plan.

KEM4 – Land West of Childsbridge Lane (120) – HO/25/00033:

The access to the site shows three access points, but we could only locate one. The additional traffic movements generated by this proposal from this site would exacerbate the burden already on the local road network. Castle Drive is a bus route and due to a lack of off-street parking, residents have no option but to park in the road. This proposal could potentially produce an additional 240 vehicles with a high increase of vehicle movements from residents, but also visitors and deliveries. This site is close to the A25, so it can be assumed that most vehicle movements will be in the direction of the A25 via Seal. Childsbridge Lane, during peak times, is heavily congested on a daily basis. This proposal would exacerbate the situation, adversely affecting residents from Seal and Kemsing alike. The increased vehicle movements will increase the safety risk for pedestrians who use the railway bridge to cross from Kemsing to Seal. Significant safety concerns for pedestrians have been highlighted by Seal Parish Council.

The site has a woodland and rural character and to the West, abuts the green open space Oxenhill Shaw, managed by Sevenoaks District Council in co-operation by Otford and Kemsing Parish Councils. It is adjacent to the open space Nightingale Recreation Ground owned and managed by Kemsing Parish Council, with open farmland to the East. The site provides a wildlife corridor with a valuable asset contributing to maintaining the biodiversity of the neighbourhood. It provides a buffer between the motorway and a large housing estate within the village.

The proposal will have a detrimental impact on the Green Belt adjacent to the site. The Green Belt Assessment Evidence Based Document states that the sub-area is not located at the end of a large built-up area and does not meet purpose (a). The description of the boundary clearly states it is bounded by the residential properties along Cleves Road.

Surely the weight of the impact on purpose (c) should be taken into consideration given the site adjoins the wider Green Belt to the north, east, south and west and the adverse implications this proposal would have. The 'natural barrier' created by the M26 motorway should not be considered as the only reason to then classify this as a Grey Belt area.

The site is in very close proximity to the M26 motorway. We are concerned about the potential limits on noise and air pollution, making this site not suitable for a housing development. With reference to Policy AQ1, it is imperative that an air quality assessment should take place in this location.

The village school in Kemsing takes in one class each year; 30 pupils. From census records the average number of four years olds is about 50. The two neighbouring village schools are two class entries and often take children from the village. Some years the village school is unable to satisfy the intake requests from villagers which cause local issues.

The proposal comprising 120 new homes will create an additional burden on the already overstretched medical and healthcare facilities in Kemsing as well as the drainage and sewerage infrastructure.

Kemsing Parish Council recommends this site is unsuitable for development and should be removed from the Local Plan.

KEM05 – Land at West End, Kemsing (181) – MX/21/00046:

This site is described as large open countryside in the Green Belt. Any development would adversely affect the Green Belt. We noted that during the Green Belt Assessment, the site was not accessible

and that evidence is based on an aerial photograph. We do not agree with SDC's conclusion that there would be no impact on the wider Green Belt. It is also a site of Medium Landscape Sensitivity. The proposal will detract from the openness of the Green Belt with the views to the South. We fundamentally disagree with the Grey Belt reclassification for this site. The Assessment states that the sub area is not located at the edge of a large built-up area, in physical or perceptual term and therefore does not meet purpose (a). Kemsing Parish Council urges SDC to reconsider this assessment. It is extremely clear that this site is at the edge of a larger built-up area, particularly to the north, but also to the east and west, where there is a large number of existing houses. The Green Belt Boundary Assessment states that if the sub-area were released, the new inner Green Belt boundary would not meet the NPPF definition.

The sheer scale of 181 homes will potentially generate a substantial increase in current vehicle movements, not only by residents, but also by deliveries and visitors. This will adversely affect the already overburdened road network. The access to the site is across a footpath used daily by pedestrians to attend the local Primary School, local shops and amenities, Dr. Surgery, village hall and St. Mary's Church. This is also a bus route and there are already parked cars on the road because of a lack of off-road parking provision.

With regards to the Mixed Use and reference to 'Community Use' and/or 'Light Industrial Use' – how are we expected to comment given the lack of details? If this is comprising a building for community use, we already have six buildings to serve the need within the village. Another Community building will have an adverse financial impact on the existing establishments. Visitors to the 'community space' will exacerbate the existing traffic problems. Coupled with the visitors to the Quarry development and KEM3 and KEM4, the road network will become unsustainable.

The village school in Kemsing takes in one class each year; 30 pupils. From census records the average number of four years olds is about 50. The two neighbouring village schools are two class entries and often take children from the village. Some years the village school is unable to satisfy the intake requests from villagers which cause local issues.

The proposal comprising 181 new homes will create an additional burden on the already overstretched medical and healthcare facilities in Kemsing as well as the drainage and sewerage infrastructure.

Kemsing Parish Council recommends this site is unsuitable for development and should be removed from the Local Plan.

NOA1 – Baldwins Yard, Noah's Ark, Kemsing (40) – HO/21/00079:

Noah's Ark has been classified as a hamlet. The Parish Council expressed concern during the Assessment Stage, but this was not taken into consideration by SDC. We noted that this site has not had a Development Brief prepared for this Regulation 18 Consultation, and that therefore, the figure of 40 homes may be subject to change. Can SDC please advise when the Brief will be made available?

We do not agree with the Grey Belt Assessment. The 'limited services' in Noah's Ark have not been clarified. The Assessment states that this area has a large urban character, yet it is surrounded by Green Belt and open fields and countryside. How has this urban character been assessed and the conclusion reached? How can the areas be deemed to have urbanising influence by one railway line along the most southern boundary? The Assessment describes the Noah's Ark and Greenlands Road housing development as 'extensive' residential development? Clearly this classification is incorrect. How can two roads be classed as extensive development? The Assessment document further states that the removal of the sub-area is unlikely to alter the performance of the wider Green Belt purpose (c) since it is already developed and adjoins an existing development to the east. Allowing 40 new homes just using Green Belt land because there are a few houses there already, does not, in our view, justify an unacceptable adverse impact on the wider Green Belt. The Kent Downs National Landscape restriction also applies in this area.

It has already been acknowledged that there are challenges with the existing road network.

The additional traffic movements caused by this development will exacerbate the already congested access roads. We have identified measures to improve safety at the junction with St. Edith Road and High Street and are actively seeking the installation of double yellow lines in this area. This development will result in additional vehicle movements which will increase the risk of accidents.

Access to Kemsing station is along a dangerous and narrow road with hedges on both sides which provides no safe pedestrian access to the station where there are limited car parking spaces (a total of 8). Access to Seal Town Centre, is via a narrow country lane not suitable for pedestrians. There are limited parking spaces at the High Street. This hardly constitutes a service.

Noah's Ark Road is a very narrow lane and reduced to single traffic by cars being parked outside of houses as there are limited properties with off road parking and only a small section of footpath for pedestrians. The increased number of cars generated by this proposal will increase the safety risk for pedestrians as there is no street lighting.

We are concerned about the loss of two commercial units and the loss of jobs for local people. This would be detrimental to the rural economy and contradicts with the Local Plan Vision and Objectives No 6.

The village school in Kemsing takes in one class each year; 30 pupils. From census records the average number of four years olds is about 50. The two neighbouring village schools are two class entries and often take children from the village. Some years the village school is unable to satisfy the intake requests from villagers which cause local issues.

The proposal comprising 40 new homes will create an additional burden on the already overstretched medical and healthcare facilities in Kemsing as well as the drainage and sewerage infrastructure.

Kemsing Parish Council recommends this site is unsuitable for development and should be removed from the Local Plan.