

ProVision Public Consultation

Land South of Four Elms Road, Edenbridge

Closing date for the Public Consultation Friday 19 July

1. Response from NEDRA (New Edenbridge & District Residents' Association)

Thank you for the recent opportunity to discuss the details of the site with you. We do note that the scheme does attempt to accommodate the existing ecology/receptor sites and the Public Open Space which was protected in a S106 in the previous planning applications. You have also retained as much of the mature landscape and trees as possible which is of vital importance to the residents of Edenbridge. Despite misleading statements by the SDC planning officer this site is highly performing Greenbelt (as confirmed in the ARUP report) and any development in this area must be treated with the utmost sensitivity to landscape, biodiversity and the protection of the endangered species located here. We do not recognise any classification of this area as 'weakly performing' Greenbelt and this term is not found anywhere in any version of the NPPF.

2. On behalf of the residents of Edenbridge we do not support the development of the site for additional housing.

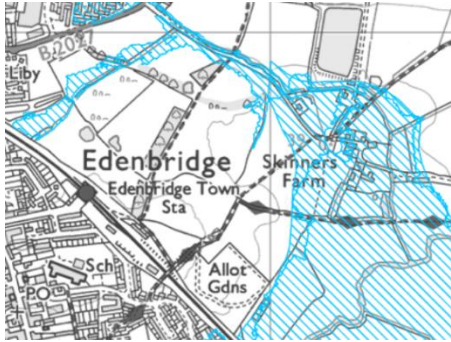
You have stated that by moving the school you will need to build another 103 homes. We have subsequently found out that you have only lost approximately 25 homes by moving the school. The loss of these homes does not require taking additional Greenbelt and could be recovered by increasing the density of homes in the areas shown.

The detrimental impact of extending the development into two new areas of Greenbelt creates more harm than benefit to residents. The areas taken are extensive areas for walking with many PROWs and will create a loss of amenities. Residents will now be stepping out into a housing estate and not the countryside. The character and charm of the rural landscape will be lost. Edenbridge is a historic market town set in the countryside and views back to it from the footpaths currently show fields and the church, your proposed development will change all of that and residents will be looking back onto a housing estate.

Whatever the Landscape, Ecology, Management and Monitoring Plan (LEMMP) says, we do not believe it can mitigate the loss of feeding grounds and habitats for wildlife. The impact on the endangered species will be catastrophic to their survival, as will the noise, light and air pollution created by the extension of this site.

The development biodiversity net gain has been set at 10% and falls outside of the 20% defined by the SDC Local Plan. While we understand this site has been taken outside of the Local Plan (although fail to understand why), we would like to see 20% biodiversity net gain, in line with the Local plan. We also note that you plan for the biodiversity net gain to be offsite and would strongly suggest that it was kept onsite.

We would also raise concerns about the flood risk in this area and the impact this will have on other areas, increasing the pollution in the River Eden. Previous schemes on flood plain areas in Edenbridge have not successfully addressed these problems. Oakley Park Estate is a prime example where known flood issues have left residents with sewage and drainage problems.

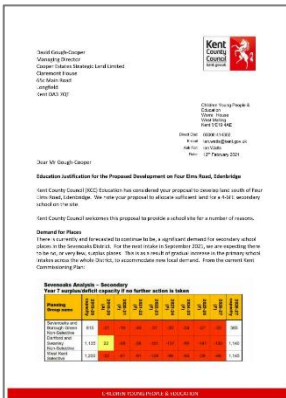


This extension of the development takes proposed homes very close to Flood Zone 2 which of course then flows into Flood Zone 3. The impact of the runoff water from roofs and roads will have a huge impact and we do not believe that Southern Water will be able to manage this without releasing Storm Spillage (sewage) into the River Eden. Having captured water into your SUDS there is no understanding on how or where this is going to be released.

The best way to provide drainage for flood water are fields and meadow land, areas your extended plan will remove. Edenbridge is a flood plain, and the fields and meadows serve a vital service to the town.

3. On behalf of the residents of Edenbridge we do support the proposal to relocate the secondary school on the basis this would enable the school to be delivered earlier, however, we do not support using it as a justification to build an extra 103 homes.

The viability of a 4FE is extremely unlikely and there is a question mark over the 6FE.



In reference to a letter (freedom of information request) to Cooper Estates from KCC 12 February 2021 (**Appendix 1**):

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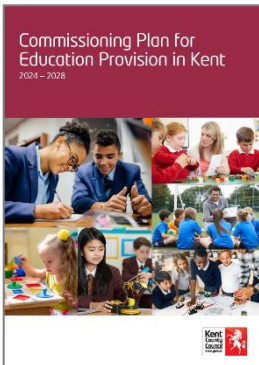
*“KCC Education would highlight the **issue of sustainability** of the new school.”*

*“A 6FE school is far more likely to gain approval by the DfE. The issue is that KCC would need to query whether a **6FE school** is going to attract sufficient students to make it **financially viable**.”*

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“It would appear that currently, there is insufficient demand for a 6FE school, but it is highly likely that this situation will change in the future; particularly following publication and implementation of the Sevenoaks Local Plan.”

A more recent document ‘Commissioning Plan for Education Provision in Kent 2024-2028’ (**Appendix 2**) says:



page 93: ***“No decisions can be made until the Local Plan is published, but it is possible that the solution lies in Edenbridge where there is a site that could be available for a new secondary school. The commissioning of a new school in Edenbridge depends on viability of a new school. Currently, there is insufficient demand in Edenbridge and its environs to support a new secondary school. If sufficient new housing was outlined in the new Local Plan, KCC will again consider whether a new school in Edenbridge is viable.”***

It is not possible to say that the school is an exceptional or special circumstance **as its viability has not been confirmed**. It seems to rest solely on the outcome of the 2040 local plan. On this basis **no decision relating to the building on this site should be agreed until the outcome of the Local Plan is known**.

We would also like to know why Cooper Estates have changed their position so radically from 2016 to now. The email below to Christine Lane, previous Town Clerk of Edenbridge Town Council (freedom of information request – **Appendix 3**) shows that Cooper Estates said that they would be happy to release land and **there would be no conditions attached** for additional housing.

From: Robin Buchanan [<mailto:r.buchanan@pvprojects.com>]
Sent: 15 July 2016 16:47
To: Christine Lane
Subject: RE: LAND AT ST JOHNS WAY AND ENTERPRISE WAY, EDENBRIDGE
Importance: High

Hello Christine

Thank you for your message and sorry I couldn't reply sooner.

I think we all share a common sense of purpose that whenever and wherever it is ultimately decided there is to be new housing, it should be designed to the highest standards of layout and appearance (or 'lovely' as you succinctly put it). I sincerely hope that will be the case at Edenbridge, though it is unlikely to involve me or Pro Vision; however, ETC and local people will have an important say in the detailed design of the housing development west of St Johns Way. Perhaps in a few years we can take a walk around what will in fact be a lovely addition to the Town.

Secondary school. As you know Cooper Estates has expressed a desire to work in partnership with relevant local stakeholders, including ETC, to help deliver facilities and services for the Town in light of the new housing on its site west of St Johns Way. Cooper Estates is in the fortunate position of being able and willing to release local land assets to do this **at no cost and not conditional on any more housing being built in the Town**. Provided that it is used for the building of a new school and an appropriate body wants to do this, the Cooper Estates land at Four Elms road is available for that purpose.

4. Yes, we would support the inclusion of additional community facilities, but this is on the basis there are no conditions attached to these for additional housing.

Most of the facilities offered were already included in the outline planning permission for 340 homes. The main addition on this revised plan being the Youth Centre and the funds to refurbish the skate park. Based on the huge profits to be made on the release of this additional Greenbelt and the negative impact this will have on the character, biodiversity, and visual landscaping of our town, if the proposal for additional homes goes ahead, we would suggest these extra community facilities should be offered anyway, without any strings attached.

5. As already stated, we do not support the expansion of the site based on the concerns and arguments we have put forth already. We do acknowledge that the revised Illustrative Masterplan has attempted to accommodate some of our key concerns about the loss of ecological habitats, public open space, and the conservation of existing Tree Preservation Orders.

The road networks are going to disrupt the conservation areas with noise, traffic flows, pollution. Housing is a major source of light pollution.

We strongly object to the extension of the scheme into further Greenbelt land and believe the visual impact of this is extremely detrimental and spoils many of the Local Walks around the town.

We have additional concerns that when you hand the land over to the builders the same ethos and considerations shown in the plans to the ecological spaces do not translate into the resulting development and irreparable damage may be done which cannot be undone.

6. We would suggest the following changes or improvements:

- The development is not extended into further Greenbelt, rather increase the density of the existing plan.
- The requirement for allotments is not necessary. The area is under water for eight months of the year. It should be left as an additional wildlife area. We already have sufficient allotments with plots unused.
- The station improvements should be just that and the money spent exclusively on the station to provide proper disabled access to both platforms with lifts available. Network Rail can provide their own safety requirement for the Little Mowhurst Crossing.

Appendices

Appendix 1 – Letter to Cooper Estates

Appendix 2 - Commissioning Plan for Education Provision in Kent 2024-2028

Appendix 3 – Email 15 July 2016 to Edenbridge Town Clerk