Objection to Four Elms Road Development Proposal (24/02765/OUT)

Summary of NEDRA [New Edenbridge District Residents' Association] Response

Context and Background

The Four Elms Road development proposal represents a significant residential expansion project in Edenbridge, seeking to construct 450 residential units on Green Belt land. This marks a substantial intensification and material departure from the previously approved scheme of 340 units, raising numerous concerns about its impact on local infrastructure, environment, and community character.

The site occupies a strategic location east of Edenbridge, bounded by Four Elms Road, with portions falling within Flood Zones 2 and 3. The proposal emerges within a challenging planning context, as Sevenoaks District Council grapples with housing delivery pressures while maintaining its 93% Green Belt coverage. The development promises various community benefits, including land reserved for a potential secondary school, though the viability of this particular commitment has been questioned.

Major Findings

There are several critical material concerns that challenge the development's viability and appropriateness. Foremost among these is the mischaracterisation of the site's Green Belt status. Evidence demonstrates that only 6 hectares (approximately 5.5%) of the site could be considered weakly performing Green Belt land, while 94.5% demonstrates strong Green Belt performance according to the SDC Arup report.

There are substantial concerns over ecological impact, including a 38.62% net loss in habitat units. The site currently supports rich biodiversity, including 34 breeding bird species, seven bat species with hundreds of daily passes, an exceptional slow worm population, and Great Crested Newt habitats. The proposed development threatens these established ecosystems along with mature trees and hedgerows that contribute to local ecological networks.

Infrastructure capacity emerges as another significant challenge. Water services assessment reveals the network "fails [the] capacity check" with predicted pressure reductions, while sewage treatment capacity shows concerning limitations. Transport infrastructure appears inadequate, with limited public transport options. The electrical infrastructure requires a substantial £2.6M upgrade, with uncertainty surrounding implementation timeline and network capacity.

There are significant challenges regarding flooding, drainage, and sewage. The site is partially located in Flood Zones 2 and 3, raising concerns about flood risk, especially during extreme weather events, and the potential disruption to existing drainage systems. Incomplete surveys and technical

deficiencies in flood risk assessments, such as the lack of comprehensive ground investigations, exacerbate these risks. Additionally, the drainage strategy heavily relies on artificial systems with no natural infiltration, further heightening the risk of surface water runoff and inadequate management. The sewage infrastructure also poses a problem, with current systems already operating at critical capacity and no clear plan to accommodate the increased load.

Analysis of Results and Implications

The proposal's conflicts with planning policies are numerous and significant. Green Belt protection requirements are not met, as the development fails to demonstrate the "very special circumstances" necessary for such development. Environmental protection standards are compromised by the significant biodiversity loss and inadequate mitigation strategies. Infrastructure planning lacks comprehensive improvement strategies and defers critical technical assessments to post-approval stages.

A fundamental issue emerges regarding the proposed secondary school. Kent County Council Education indicates that 2,000-2,700 new homes would be needed to make a secondary school viable, far exceeding the proposed 450 units. This casts doubt on the legitimacy of using the school as justification for development and raises questions about the delivery of promised community benefits.

Long-term sustainability concerns span environmental, infrastructure, and social dimensions. The development threatens to permanently alter local character through the loss of natural habitats, increased flood risk, and reduced green space. Infrastructure strain would likely impact existing services, while limited public transport options raise questions about sustainable transportation. Social impacts include the loss of recreational spaces and uncertainty about community facility delivery.

Recommendations

A fundamental reconsideration of the current proposal is necessary. The planning authority should reject the current application due to its significant shortcomings in Green Belt protection, environmental mitigation, and infrastructure planning. Any future proposal must demonstrate comprehensive environmental impact assessment and detailed infrastructure improvement plans with agreed funding before approval consideration.

If development proceeds in any form, and we would propose that it does not, significant modifications are essential. The scale should revert to the original 340 units, maintaining development within the previously approved boundary while potentially increasing density rather than expanding the footprint. Environmental protection must achieve the required 10% biodiversity net gain on-site [this is currently proposed to be off-site], preserve existing wildlife corridors, and enhance flood mitigation measures. Infrastructure improvements need secured commitments for utility upgrades, transport infrastructure enhancements, and guaranteed community facility delivery.

Challenges and Implementation Considerations

The site presents inherent technical constraints that must be addressed. These include managing flood risk areas and complex drainage requirements, which may not be possible in this area. Infrastructure capacity poses significant challenges, particularly regarding utility network limitations and transport

infrastructure constraints. The timing and phasing of development require careful consideration to manage construction impacts while ensuring timely delivery of community benefits.

Financial viability concerns extend beyond initial construction to long-term maintenance requirements. For example, substantial infrastructure costs, including the £2.6M electrical upgrade, and the flood defence mechanisms must be balanced against maintenance costs over time and an understanding of who is responsible for these costs.

Future Considerations

The immediate priority for the planning authority should be requesting additional technical assessments and securing robust infrastructure delivery guarantees. The developer must provide comprehensive environmental mitigation strategies. These should align with broader Local Plan development while considering the cumulative impact of other developments in the area.

Long-term planning must focus on protecting community interests through secure management arrangements and preserved amenity values. Environmental safeguards require ongoing monitoring of biodiversity impacts, maintenance of flood protection measures, and preservation of Green Belt integrity. The development's integration with the existing community needs careful consideration to ensure sustainable growth.

Summary Conclusions

The current proposal presents fundamental challenges that question its viability and appropriateness for the location. The mischaracterisation of Green Belt status, significant environmental impacts, infrastructure inadequacies and building in a flood zone, suggest the need for substantial revision before any development could proceed sustainably.

The evidence indicates that successful development of this site would require: A comprehensive reassessment of scale and density to respect green belt status, robust infrastructure planning with guaranteed delivery mechanisms, enhanced environmental protection measures achieving required biodiversity gains, clear demonstration of need and justification for green belt development, and secure commitments for community benefit delivery

While housing pressure in the district is acknowledged, this cannot override the fundamental planning principles protecting green belt land and ensuring sustainable development. The current proposal's significant shortcomings in meeting these requirements indicate that it is not a suitable site for development.

We feel there has not been genuine engagement with these challenges and rather than deferring critical assessments to post-approval stages or attempting to circumvent planning requirements through selective presentation or manipulation of technical documentation, that full data should be made available across the whole site, before any planning permission is granted.

We believe the original outline planning permission may have been based on flawed assumptions and missing information and so believe the entire site and whole proposal requires a formal review under the Town and Country Planning Act 1990 provisions, and we request these concerns be given full consideration in the ongoing consultation process.

Planning Statement

Unjustifiable Green Belt Encroachment

The proposed development represents an alarming encroachment into the Metropolitan Green belt, without demonstrating the special or exceptional circumstances required under the National Planning Policy Framework (NPPF). Expanding the Green Belt boundary by an additional 10 hectares, as proposed, sets a dangerous precedent that could lead to unchecked sprawl into open countryside. Higher densities should be explored before any additional green belt release is considered.

This land was removed from development in the 2040 Plan, further undermining any justification for altering its status. **The site was also identified by Arup as "Strongly performing Green Belt" land, contrary to claims in the planning statement that it's "weakly performing**." Why was the Arup report not uploaded in the documents this time around? **This error has materially influenced previous planning decisions and must be corrected**. The characterisation of this site as "GREYBELT" is a highly misleading description.

Failure to Honor Previously Approved Commitments

The application introduces shifting promises and vague conditions that jeopardise key community benefits, such as the provision of a school. **The requirement that 70% of homes be occupied before the school land is released is not only excessive but also risks the land reverting to developers if the 2040 deadline is missed**. This undermines the assurances given to residents and councillors during earlier planning approvals.

A recent letter from the Head of Education at KCC (below) suggests that the school may not be viable within the Local Plan timeframe (by 2040). The land could therefore transfer to KCC/SDC in perpetuity for educational purposes, with permitted interim use as public open space, as previously approved under SE/08/00252/FUL. This would secure the land's long-term community benefit.

To
[redacted]
Chair of NEDRA (New Edenbridge District Residents' Association)

By Email: info@nedra.org.uk

Children, Young People and Education
County Hall
Sessions House
Maidstone
ME14 1XQ

Ask for: [redacted]
Phone:
Email:
Date: 17th September 2024
Ref No: 001/NEDRA

Dear [redacted]

Reference: 001/NEDRA

Thank you for your email of 4th September 2024. I appreciate you seeking the County Council's view, as the definitive position.

I must reiterate much of what I said in my previous letter, but recognise the specific issue you raise, and why it is of interest to you and your group.

The answer is certainly tied to the publication of the Sevenoaks District Local Plan, insofar that as previously stated, a school must be viable before it will be considered by KCC or the Department for Education. Viability is determined by one issue. That of there being sufficient students to fill or nearly fill the school, and that the expectation is that the school will see viable numbers in the future. You may or may not know that the old Eden Valley School in Edenbridge was closed, largely because there were insufficient students to populate the school. Naturally, this adds an aspect of concern for KCC to ensure that if a new school is established, it doesn't suffer the same fate.

Demand for secondary school places does not depend on a population figure, per se. KCC has very accurate data that can show where every secondary school pupil attends school (except for the dozen or so who attends schools outside of Kent).

Analysing this data gives us accurate figures of students that live in the Edenbridge and surrounding areas, that attend all-ability, Grammar and faith schools. Assuming that the levels of students who attend (or will attend) Grammar or faith schools remain unchanged, we are left with the proportion of students that attend all-ability, and might therefore be expected to go to a new all-ability secondary school in Edenbridge, if it existed. That figure varies, but is in the region of 75 Year 7 students every new school year.

Obviously, that isn't enough to make a new secondary school viable, so we come back to your question. Rather than look at a population number, we look at the number, type and location of new housing. The Sevenoaks Local Plan has already indicated a number of new homes on Four

Elms Road, around the area that has been suggested for a new secondary school. Our understanding is that the number of new dwellings originally was 340, but in June the number being proposed increased to 443.

Assuming that 443 (or thereabouts) is the number being delivered, your question therefore, is how many more new dwellings would be needed to be proposed in the Edenbridge, surrounding villages and environs, to suggest that a new school is required?

Given that the type of new home has a bearing on the number of children it generates, providing a simple number is challenging, although I will give you an approximate idea below. KCC use a formulaic system called the Pupil Product Ratio (PPR) which, in its simplest form, forecasts a specific number of school age children that will emerge from a specific number of new houses. The PPR is expressed as 0.2 for secondary, which means that for every five houses, we would expect see one secondary aged student. So, every hundred homes would be expected to generate twenty secondary school age children.

Using a PPR of 0.2, if 443 additional new 3 or 4 bed family homes were proposed, that would likely generate about 88 secondary students, every year, across all year groups. This is 18 new Year 7 students, every year. If those new dwellings were 1 or 2 bedroom flats or apartments, then the number of students falls significantly, providing only about 10 new Year 7 students.

I have to stress that the following numbers are based on forecast, and based on assumptions of dwelling size, and of the numbers of Edenbridge resident students who would wish to attend the new secondary school.

	Year 7 Students	Total Forms of Entry
Existing Edenbridge Residents attending an all-ability school	75	2.5
Numbers of students generated from 443 new family homes on Four Elms Rd	16	0.5
Numbers needed for a 5 FE school	150	5
Numbers needed for a 6 FE school	180	6

It must be borne in mind, that a proportion of any new secondary demand will seek Grammar or faith-based schooling. Therefore, the answer to the question is that Edenbridge (and surrounding areas) would need at the very least, 1475 new family homes (over that already proposed on Four Elms Road) to make a new 5FE school viable and at least 2225 new family homes to make a 6FE school viable.

Kind regards

[redacted]

Director of Education and SEN

Cc

[redacted] Assistant Director Education (North Kent)

Inconsistencies and Misleading Information

Deeply troubling are the numerous inconsistencies and inaccuracies in the planning documentation. Claims regarding the site's designation as previously developed land / grey belt rather than greenbelt, its biodiversity value, misrepresentation of local amenities (e.g., banks and post offices which no longer exist and raise questions about the thoroughness of local analysis), and transport links are either outdated or outright false. Such inaccuracies risk misleading councillors and the public, particularly those unfamiliar with the site. The proposal also fails to meet the NPPF's "golden rules" for Green Belt development, offering only 40% affordable housing instead of the required 50%.

Inadequate Infrastructure and Environmental Harm

The proposed development fails to align with the town's infrastructure capacity or environmental protections. With nearly 500 homes already built since the last census, there is no demonstrated need for an additional 450 homes, nor any compelling evidence, especially at the expense of high-performing Green Belt land. Policy LO6 makes provision for approximately 410 dwellings in Edenbridge between 2006-2026 on various sites suitable for residential use within the urban area. What is the justification for further significant development beyond this threshold?

Furthermore, the proposal would destroy mature trees, hedgerows, and ponds of significant ecological importance. These impacts contradict local planning policies that prioritise biodiversity, topography, and the preservation of outstanding views. The site has significant biodiversity value and is located in a floodplain used by migrating birds. The development would impact two Public Rights of Way, reducing them to urban pavements, representing a significant loss of rural character and amenity value. The proposal contradicts earlier assessments of the site's environmental significance and appears to minimise these impacts in the planning statement.

Questionable Rationale and Lack of Community Consensus

The justifications for the development rely on flawed assumptions, such as Edenbridge's designation as a "Top-Tier Settlement," despite its limited road access and rural character. The current consultation reveals significant local opposition and the developer quoting approval from the previous consultation is laughable.

The development's scale and nature are not consistent with the genuine needs of the Edenbridge community and raises questions about local infrastructure capacity, particularly given Edenbridge being served only by country lanes and B-roads with railway bridge pinch points.

AIR_QUALITY_ASSESSMENT-3577109

The developer's air quality assessment reveals several significant concerns that warrant challenge. Most critically, the assessment identifies a "high risk of dust soiling impacts" during construction and predicts increases in air pollution, particularly at the Four Elms Road/Station Road junction, while relying on just three months of monitoring data to validate their models. The addition of 450 homes will generate substantial new traffic, yet the assessment fails to properly analyse peak-time pollution levels or consider the cumulative impact of other local developments. This is particularly concerning given the site's proximity to existing residential areas and the location of key receptors, including properties where the assessment already predicts increased pollution levels.

The developer's mitigation proposals lack specific commitments, instead depending heavily on "good practice" and vague promises. For instance, while electric vehicle charging points are "anticipated," there are no firm commitments on their provision. Similarly, construction impact mitigation relies on general "suitable measures" rather than detailed, enforceable, or measurable controls. The developer's claim that impacts will be "negligible" is based on incomplete data and assumptions, particularly regarding future traffic patterns and emission levels. These shortcomings appear to conflict with both the current Core Strategy Policy SP2 and emerging Local Plan Policy AQ1, which require developments to demonstrate positive or neutral impacts on air quality. Both require clear, detailed mitigation strategies, alongside comprehensive data.

For residents, these issues translate into potential real-world impacts: increased dust and pollution during a lengthy construction period, worsening air quality at key junctions, and additional traffic congestion in an already sensitive area. The assessment's reliance on “professional judgment” in key areas such as construction vehicle emissions, judgements on the overall significance of the effects of air quality and population exposure, qualitive assessment of hourly pollutants, construction stage limitations and traffic data and model adjustments, rather than comprehensive data suggests that actual community impacts could be significantly worse than predicted. SDC should insist on additional monitoring, specific enforceable mitigation commitments, and a more comprehensive analysis of combined local environmental impacts before any approval is considered.

NOISE_VIBRATION_ASSESSMENT-3577344

The noise assessment reveals significant concerns about residential quality of life for future residents, particularly along Four Elms Road where noise levels will exceed recommended standards.

The document acknowledges that residents would need to keep windows closed "most of the time" to maintain acceptable noise levels, yet crucially fails to provide a comprehensive assessment of how this would impact ventilation and overheating - a significant oversight that could render homes uncomfortable or potentially uninhabitable during warmer months. The assessment's limitations are particularly concerning based on just 2.5 days of monitoring in March 2024, using only three measurement locations for a 450-dwelling development, and deferring crucial technical assessments to unspecified future dates.

The developer's reliance on theoretical modelling (based on 2.5 days or monitoring) rather than comprehensive real-world measurements, with complete absence of crucial assessments for construction noise, and future traffic growth should be challenged. The assessment also makes critical assumptions while deferring key decisions about ventilation strategies and plant noise to post-planning stages - effectively asking for approval without

demonstrating the development's viability.

The developer's approach of postponing crucial technical assessments to later stages effectively prevents residents from understanding and challenging the true impacts of this development on their community. These gaps in assessment, combined with the identified noise levels and ventilation concerns, suggest the current proposal could significantly impact both future and existing residents' quality of life, contrary to NPPF requirements for preventing "unacceptable levels of noise pollution."

GEO-ENVIRONMENTAL_PRELIMINARY_RISK_ASSESSMENT-3583902

Despite being dated October 2024, the assessment fails to provide any current actual risk analysis, methodology, or conclusions - instead, offering only a series of historical map references without interpretation or context.

The document lacks essential components including current site conditions, environmental risk evaluation, habitat assessment, and professional verification. Of particular concern is the complete absence of any methodology explanation, risk categorisation, or recommendations - all fundamental requirements for understanding potential impacts on the local area and its residents. These omissions suggest either a rushed assessment process or an attempt to minimise potential development constraints.

There are several challenges to this document:

- The reliance on decades-old mapping data without current verification is unacceptable for a 2024 development proposal,
- The complete absence of actual risk assessment methodology, criteria, or conclusions renders the document ineffective for its stated purpose, and
- The failure to assess current environmental conditions demonstrates inadequate consideration of local environmental impacts.

A new, comprehensive assessment incorporating current data, clear methodology, and independent professional verification should be required before any development decisions are made.

GEO-ENVIRONMENTAL_PRELIMINARY_RISK_ASSESSMENT-3583903

Based on the detailed review of the UXO risk assessment document, there are significant grounds for concern regarding public safety and development viability that warrant formal objection. The preliminary assessment reveals potential unexploded ordnance risks but critically fails to provide comprehensive risk analysis, proper methodology, or clear mitigation strategies. Most concerning is the document's own disclaimer stating it "should not be reported as [UXO] risk," yet the map indicates it provides a hazard from unexploded bombs (UXB) due to WWII bombardment, raising serious questions about due diligence and public safety.

From a planning perspective, three critical challenges emerge:

First, the assessment lacks essential technical details including the dating of data, clear methodology, and integration with wider geotechnical studies - all crucial for proper risk evaluation in a residential context.

Second, there's a concerning absence of reference to relevant planning policies, HSE guidelines, or Construction Design and Management regulations, suggesting inadequate consideration of the regulatory framework designed to protect public safety.

Finally, the document fails to address how UXO risks might impact both the construction phase and long-term community safety, with no clear mitigation strategies or emergency protocols outlined.

The lack of comprehensive risk assessment directly affects community safety and property values, while the absence of proper methodology and mitigation strategies raises serious questions about the development's viability and safety. We urge SDC to push for a comprehensive UXO desk study, detailed ground investigation, as well as a detailed construction phase risk management plan, incorporating UXO risk mitigation measures, emergency protocols, and adherence to HSE guidelines for safe construction in areas with potential unexploded ordnance.

GEO-ENVIRONMENTAL_PRELIMINARY_RISK_ASSESSMENT-3583895

The site presents significant environmental and safety risks, including areas within Flood Zones 2 and 3 with documented high surface water flooding risks, the presence of historical mine workings, and a confirmed high risk of unexploded ordnance (UXO). The document itself acknowledges gaps in investigation, with areas of the site remaining unassessed and multiple ground gas monitoring attempts failing due to flooding, yet remarkably proceeds to make development recommendations despite these data gaps.

The developer's assessment notably understates or defers addressing several critical issues that could directly impact community safety and well-being. The report acknowledges but fails to adequately assess the site's role in local drainage, with multiple ponds and water features that could significantly affect flood risk to surrounding properties if disrupted. Furthermore, the assessment of infrastructure capacity, particularly regarding sewage treatment and drainage systems, is superficial at best, with no meaningful analysis of how existing systems - already showing signs of strain - would cope with 450 new dwellings. No consultation with Southern Water to provide detailed modelling of drainage impacts. The climate change assessment is particularly weak, focusing primarily on sea level rise while failing to provide quantitative projections or assess specific impacts on the site or surrounding areas.

Most concerning is the document's repeated deferral of critical investigations to post-approval stages, effectively asking for planning permission before fully understanding the site's risks and necessary mitigation measures. Deferrals include ground gas monitoring, soil sampling for contamination testing, geotechnical parameters for foundation design, unexploded ordnance (UXO), and infrastructure capacity.

The loss of priority habitat (deciduous woodland) and agricultural land within the Green Belt is dismissed without proper evaluation, while the proximity to a Conservation Area and impact on local character receive minimal attention. We believe that these gaps in assessment, combined with the identified risks, provide strong grounds for opposing the development until comprehensive investigations are completed and appropriate mitigation strategies are fully detailed and guaranteed.

GEO-ENVIRONMENTAL_PRELIMINARY_RISK_ASSESSMENT-3583897

The proposed development site presents significant environmental and safety concerns that warrant robust challenge. The site has documented high flood risk with multiple recorded flood events and surface water issues.

From a community perspective, the most pressing concerns relate to infrastructure capacity and public safety. The site's complex hydrogeological setting, combined with historical industrial activities and pollution incidents (2 within 50m, 6 within 250m), raises significant questions

about contamination risks and drainage impacts on neighbouring properties. These factors, alongside the documented flood risks, indicate that development could pose substantial risks to both future occupants and existing residents while potentially overwhelming local infrastructure.

These risks clearly indicate a high vulnerability to flooding, which conflicts with NPPF paragraph 165, requires that developments should avoid areas at high flood risk where possible and that development should be safe "for its lifetime without increasing flood risk elsewhere." This is reiterated at paragraph 170, discussing exception tests, where section (b) says: "the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

The development would significantly impact the area's ecological and cultural heritage. The site's role in local biodiversity should be protected, particularly given the documented presence of multiple water features and wildlife corridors that would be disrupted by development.

In the 2022 planning application for this site 20/02988/OUT the biodiversity report highlighted the richness of ecology:

34 species of birds were found breeding within the site in 2019, these aren't just of local significance, 9 species are of conservation concern (including those on the Red List).

- At least 7 species of bat were recorded on the site in 2019. Bat passes numbering hundreds a day were recorded on the site.
- An "exceptional" slow worm population has been recorded on the site in significant numbers. These species are protected.
- Newt population (including protected status Great Crested Newts) were found on the site.

Why is that detail not showing in this revised application?

SDC should mandate a full environmental impact assessment, including a review of the site's role in maintaining habitat connectivity with nearby Ancient Woodlands. *See our response below on the decision made not to have an EIA for this site*

We believe that the proposed development, given its current assessment, poses significant risks to both the local community and environment. We strongly urge that further investigations be conducted, and mitigation measures be established, before any planning consent is granted.

Objection to SDC Planning Decision Not to Require an EIA for the Development at Land South of Four Elms Road, Edenbridge

Based on Schedule 3 screening criteria of the Environmental Impact Assessment Regulations 2017, we believe an EIA is essential to fully address significant environmental and community impacts. Below, we connect each concern to the relevant EIA screening criteria.

1. Impact on Greenbelt Land and Landscape Character

Relevant EIA Screening Criteria: Location of the Development (sensitivity of the area) and Characteristics of the Development (size and land use)

The development is located on "highly performing Greenbelt land," an area documented in the SDC ARUP report as vital for local ecology and recreational use. Only 6% of the site was qualified as 'weakly performing', if considered in isolation. Developing in this area contradicts the principles of maintaining landscape character and preserving public green spaces, an aspect

highly valued by residents for walking and community recreation. According to Schedule 3 criteria, the development's size and impact on sensitive land use warrant a comprehensive environmental review to address the potential for irreparable harm to landscape character and community access to natural areas.

2. Ecological Impacts and Biodiversity Loss

Relevant EIA Screening Criteria: Characteristics of the Development (risk to protected species and habitats) and Potential Impact (duration and irreversibility)

Despite the proposed Landscape, Ecology, Management, and Monitoring Plan (LEMMP), we believe this development risks severe biodiversity loss, particularly affecting endangered species and their feeding grounds.

The proposal's biodiversity net gain (BNG) is now proposed to be off site, or credits to be purchased to be used elsewhere entirely. So, this development will not adequately replace lost habitats, creating long-term and potentially irreversible impacts on local ecology. An EIA would provide a structured assessment to evaluate if higher BNG or on-site conservation measures could feasibly protect the area's biodiversity.

3. Flood Risks and Water Management Concerns

Relevant EIA Screening Criteria: Characteristics of the Development (cumulative effects on flooding and water resources) and Potential Impact (intensity and probability of the impact)

The site's proximity to Flood Zones 2 and 3 raises significant concerns about increased flood risks, especially with potential runoff from new buildings and roads. Our residents have previously experienced inadequate water management, as seen in the Oakley Park Estate issues, where the smell of sewage is overwhelming, long after the site has been completed. The proposed Sustainable Drainage Systems (SUDS) appear insufficient, and there's doubt about Southern Water's capacity to manage storm spillovers without impacting the River Eden's water quality, following a public meeting held with them recently. The intensity and likelihood of increased flooding and water pollution should necessitate an EIA. Only a full assessment can explore mitigation options or the cumulative impacts of nearby developments on flood management infrastructure.

4. Loss of Community Amenity and Recreational Value

Relevant EIA Screening Criteria: Location of the Development (impact on culturally significant areas)

The project's impact on the area's recreational and scenic value is a major concern for residents. The existing green space offers unobstructed views and connects to historic trails and footpaths. Replacing this with a housing estate would degrade the area's rural character, directly altering views that contribute to Edenbridge's historic appeal as a countryside town. According to Schedule 3, developments impacting areas of cultural and recreational significance merit special consideration. We request that an EIA be conducted to assess how visual impact, noise, and light pollution might alter the community's quality of life and local heritage.

5. Cumulative Impacts from Expanded Housing

Relevant EIA Screening Criteria: Characteristics of the Development (cumulative effects) and Potential Impact (spatial extent of impacts)

The effects of this development, combined with noise pollution, increased traffic, and strain on local infrastructure are highly probable consequences that need thorough evaluation. The Schedule 3 EIA criteria highlight cumulative impact assessments as essential for understanding how combined developments may lead to larger, widespread impacts. An EIA would evaluate whether the local environment can sustain these pressures without long-term adverse effects.

6. Conclusion and Request

Considering the points outlined, we believe that the characteristics, location, and potential impacts of this development justify an EIA to ensure a thorough environmental review. We urge SDC to reconsider its decision and mandate an EIA, thereby allowing for a structured assessment of alternatives and more effective mitigation measures. We do not believe the documents put forward by the developer are answering these questions in a meaningful way.

GEO-ENVIRONMENTAL_PRELIMINARY_RISK_ASSESSMENT-3583898

Based on a detailed analysis of the Geo-Environmental Preliminary Risk Assessment, which reveals numerous material planning issues concerning flood risk, environmental harm, heritage conservation, and infrastructure capacity. Below, we summarise the key areas of concern:

Flood Risk and Water Management:

The site also lies on a Secondary A aquifer, which is susceptible to contamination due to permeability and can allow contaminants to enter the groundwater. Historical flood records and pollution incidents, including Category 1 (major) water pollution events, amplify the environmental risks associated with this site.

Infrastructure and Public Services:

The assessment reveals ongoing infrastructure strain, evidenced by multiple discharge consents and sewage management issues spanning 1989 to 2021. The development would only exacerbate these problems.

The site's complex industrial heritage, including former sewage works, and railway sidings, present substantial risks that have not been adequately addressed. Most critically, the presence of historical ponds across the site from 1870 to 1987, combined with documented railway infrastructure within 3 meters of the boundary, raises serious questions about ground stability and contamination. The assessment identifies elevated levels of arsenic (15-25 mg/kg), lead (100 mg/kg), and chromium (60-90 mg/kg) in soil samples, which remain below residential and commercial guideline levels, however arsenic can still pose a risk if present in bioavailable forms, requiring further analysis to determine its mobility and exposure potential. The document provides no comprehensive remediation strategy.

The developer's assessment critically understates several key risks. The report's dismissal of radon risks as requiring "no protection measures" appears dangerously simplistic given the site's industrial past and multiple ground disturbances. Similarly, the presence of historical iron ore mining potential is acknowledged but inadequately investigated, with the report simply stating "underground mine workings may have occurred in the past" without proper evaluation

of subsidence risks. Historical datasets might not fully account for localised conditions, such as unrecorded small-scale mining, natural ground weaknesses, or poorly documented backfilling of old workings.

The historical pattern of appearing and disappearing water features indicate possible groundwater fluctuation or drainage issues that remain unaddressed.

GEO-ENVIRONMENTAL_PRELIMINARY_RISK_ASSESSMENT-3583900

This document raises significant concerns about the completeness and currency of site information, particularly given its reliance on historical maps ending in 1993, leaving a crucial 31-year gap in understanding the site's recent history. This creates a significant knowledge gap, especially in understanding current ecological conditions, drainage patterns, and environmental risks.

The documented presence of a pond 222m from the development site, consistently shown in mapping from 1870-1993, suggests established drainage patterns and potential ecological features that could be impacted by development. However, the assessment fails to provide current environmental data, ground investigations, or any analysis of how these historical features relate to present-day conditions.

Most critically for residents, the document's technical limitations - including missing legends (which have to be downloaded separately), undefined measurement methodologies, and absence of modern survey data - make it impossible to fully assess development impacts on local drainage, historical character, and environmental stability. The report's narrow focus on cartographic evidence, without supporting ground investigation data or current environmental assessments, leaves crucial questions unanswered about flood risk, land stability, and infrastructure capacity. This site needs current topographic surveys, **complete environmental impact assessments**, and professional verification of how historical features relate to present-day site conditions.

The lack of up-to-date environmental data directly contradicts the NPPF principle of sustainable development for environmental protection.

Comments on Transport Assessment and Travel Plan

The proposed development represents a significant intensification from the previous consent, increasing from 340 to 450 dwellings (32% increase) with higher predicted traffic generation rates (AM peak increasing from 0.503 to 0.556 trips per unit, PM peak from 0.488 to 0.525 as shown in Table 7-2, p.41).

The document notably lacks detailed analysis of several key areas affecting residents: there is no comprehensive assessment of the cumulative impact with the NHS development, limited discussion of construction traffic management beyond stating it will use Four Elms Road access (p.54), and no specific evaluation of how the increased traffic will affect existing residents' access to the station and town centre during peak periods. The developer's claims about sustainability benefits require more robust evidence given the significant increase in housing numbers from the previous consent.

The development's impact on the local community extends beyond transport concerns. Increased demand on medical services, retail, and recreational facilities risks overwhelming existing infrastructure. The vague assurances about the phased delivery, combined with limited discussion on mitigating construction-related disruption, suggest that residents' interests may not be fully addressed.

We object to the planning application's Transport Assessment and Travel Plan as follows:

1. Impact on Public Rights of Way

The proposed development risks obstructing or rerouting established public rights of way, as identified in the application's accompanying maps. These pathways provide critical access for residents and recreational use, which would be severely disrupted. The Highways Act 1980 and Paragraph 100 of the National Planning Policy Framework (NPPF) emphasize protecting and enhancing public pathways. The proposal fails to comply with these statutory obligations.

The application promotes that the existing Public Right of Way (PRoW) that runs east to west across the site...will be "retained and upgraded to make it suitable for all-weather use" (Page 6, Section 3.2.2). People want to walk in the countryside not across a built up estate. The upgrade is not an 'upgrade' it is a degradation of the country footpaths and natural amenities enjoyed by residents living in Edenbridge.

2. Local Public Transport Impacts

The transport analysis highlights the limitations of existing public transport services in the area. The scale of the proposed development will likely increase dependency on private vehicles, contrary to NPPF Paragraphs 102-103, which advocate for sustainable transport and reduced car reliance. Without adequate investment in public transport infrastructure, the proposal would exacerbate congestion and environmental pollution.

The site is close to Edenbridge Town Rail Station and the town centre, which is the main thrust of the argument for the sustainability of the site. However, the rail service from Edenbridge Town to London is poor relative to other towns in the district e.g. Sevenoaks and Swanley (see table below). Edenbridge is a branch line not a main line. Trains are once per hour, apart from one extra train into London in the morning. The diesel trains used on the line are unreliable,

recent statistics show this. Long term the diesel trains do not meet Net Zero targets. There is no plan for replacement because there is no simple low-cost solution. Upgrades to both track and rolling stock would require huge investment which is not assured by the development.

	Edenbridge	Sevenoaks Town	Swanley
Total Trains over the day	19	174	108
First Train time	06:07	04:57	04:35
Last Train Time	23:09	23:35	23:54
Total Trains from 7am to 10am	4	21	23
Fastest train time minutes*	00:44	00:24	00:27
Longest train time minutes*	00:49	00:59	00:48
Average minutes*	45	35	33

* Direct Trains to Charing Cross, Canon Street, London Bridge & Victoria

In addition Sevenoaks and Swanley have services to Blackfriars and Finsbury Park

The services within the travel assessment and associated documents are overstated. The peak hour frequency is 1 per hour in both directions, apart from between 7 and 8am, when there is also a train at 7:30. It is not 2 per hour. Edenbridge Town is the only service direct to London. Trains from Edenbridge rail station are not direct into London.

Proposed investment from developers to contribute to the provision of a carpark on the opposite side of the station is welcome but the upgrades to the station do not go far enough. There is still no internal access between the two platforms for anyone with mobility issues. The funds from the developer appear to be shared between Edenbridge Station and the Mowhurst crossing and will not go far.

Commuters from Edenbridge complain of overcrowding during peak services with passengers standing for most of the journey. This will only get worse with developments planned for Edenbridge plus locations further down the line to Uckfield. Safety will become a concern.

Edenbridge Town rail station and ticket office will require considerable refurbishment and has been closed due to a leaking roof. Mould was found on the walls, so it was considered a health and safety issue. This does not match the standard of an important commuter station.

Reliability of the train service is in question with commuters reporting that there are frequent cancellations to the service. In conclusion unreliable infrequent train services lead to people driving to larger stations and surrounding towns.

Bus services - Sevenoaks has twice as many bus journeys as Edenbridge has, Sevenoaks goes to four times as many destinations as Edenbridge. Bus services are fairly infrequent and take a long time to reach their destination. Outside of the school bus there are no direct bus services from Edenbridge to Sevenoaks.

People without a car wishing to travel to Pembury or Maidstone Hospitals will have to travel by bus to Tunbridge Wells and change. Edenbridge no longer has a hospital or A&E department. The journey to these hospitals can take at least an hour and a half if the connections are good.

3. Strain on Local Facilities

The development is likely to place significant strain on local amenities, healthcare services, and recreational facilities, as identified in Figure 4. NPPF Paragraph 92 requires developments to ensure that local facilities can meet current and future needs. The application lacks clear plans to expand or improve these critical services, potentially reducing quality of life for existing residents.

There is no hospital in Edenbridge. The application refers to the War Memorial Hospital – this was closed in October 2023 and the New Medical Centre provides severely reduced services. There is no longer an X-Ray department, the minor injuries unit does not have the same range of cover as previously. Residents are sent to East Grinstead or Pembury for stitches, the minor injuries clinic is not open on a Saturday as the facility now shares the same reception team as the Docters. There are no outpatient recuperation beds in Edenbridge. This will increase the reliance of private vehicles to transport individuals to A&E at Pembury and to appointments at Maidstone Hospital.

There are no banks in Edenbridge.

The Residential Trip Assignment appears to have overlooked the shopping trip to the Home Bargains and Lidl area. Due to the entrance being on station road, traffic will have to go onto station road, increasing traffic in this busy area. Also, at weekend the car park at the shopping area is overloaded. This development will lead to more problems in that area.

4. Impact on surrounding roads

The traffic flow diagrams (Pages 14-15) assume that surrounding roads can absorb the significant increases in vehicle movements without providing detailed capacity analyses or mitigation strategies. The developer's claim that these increases are manageable lacks supporting evidence. Based on average TRICS movement data the Four Elms site could potentially generate 2,080 traffic movements a day.

TRICS Residential Sub-Category Comparative Analysis (2022).

The traffic assessment is based upon restriction free roads off the development. Edenbridge suffers from the B2026 and B2027 being restricted for long periods to repair antiquated gas and sewers that run under the roads. In the last 6 months the B2026 has had restrictions for 30% of the time. Occasionally it has been at the junction of the B2026 and B2027. This development will cause even further restrictions. These traffic assessments do not reflect the reality of life in Edenbridge.

Traffic may be reduced if there was a secondary school in Edenbridge. However, KCC indicate that there are not enough pupils in Edenbridge to justify building a secondary school. So, it appears very unlikely that a school will be built in the time frame of this proposed development or even by 2040. Consequently, any claims of reductions due to the secondary school in the assessment are very unlikely.

4.2.1 Describes Four Elms Road B2027 as a single carriageway road. It omits to say that when it goes through the narrow and low rail tunnel that is slightly North of the site there are traffic lights because the tunnel is not wide enough for a single carriageway in each direction. Also, lorries can get stuck under the tunnel, which restricts the road and there have been many instances of the bridge being blocked when vehicles that are too high ignore the low bridge warnings.

4.2.5 Describes the B2026 Station Road. It omits to describe the low tunnel under the Redhill to Tonbridge rail line. Most lorries need to drive in the middle of the road, which restricts oncoming traffic. On the South side of the tunnel is a very busy area where there is the entrance to Lidl, Home Bargains and Greggs and the entrances to the work areas on either side of the road. Some lorries are too high for the road bridge. When they realise this, they cannot easily get away from the bridge, which causes a traffic jam. Lorries have got stuck under the tunnel. Antiquated utility lines run down the road. This year the road has been restricted numerous times. From 18 March 2024 to 4 November 2024 there have been restrictions on this road for 30% of the days. Restrictions are full closure or traffic lights. These restrictions cause long tailbacks of traffic. Insufficient consideration has been given to the impact of the new development in these situations and how it will impact on the quality of life for residents.

5. Environmental and Visual Impact

The proposed development threatens to disrupt the visual character and biodiversity of the area, contrary to NPPF Paragraph 174, which prioritizes the conservation and enhancement of the natural environment. The absence of detailed mitigation measures suggests that the development would result in long-term ecological harm and a reduction in visual amenity for residents.

The document also indicates potential disruption to natural features, such as ponds and dense vegetation, causing harm to local ecosystems. Changes in elevation across the site, noted through contour levels, suggest possible drainage and flood risks, and these are insufficiently addressed in the plans.

6. Sustainability and Accessibility

The application does not prioritize sustainability. There are no clear provisions for enhancing pedestrian and cycling routes, nor are there commitments to integrate low-carbon energy solutions. NPPF Paragraph 152 stresses the need for climate-resilient development, which this proposal fails to achieve.

The assessment includes data on public transport, cycling, and walking, but the projected trip rates for these modes are negligible. For instance, public transport users (Page 20) show a combined trip rate of only 0.178, and cycling rates are similarly low (0.104, Page 14). These figures call into question the credibility of the developer's claims about promoting sustainable modes of travel and their ability to meet policy objectives for reducing car dependency

There are no good cycle routes in Edenbridge supporting any cycle schemes on the development. The existing routes are insignificant, one is 20m long at the north end of town and the other is 50m long at the traffic lights at Stangrove road and Mont St Aignan Way. This route does not go to the Lingfield road junction. There are essentially no cycle routes outside the development. Expecting people to cycle along the B026 or B027 with heavy traffic and limited cycleways means this form of transport is being overstated.

Detailed within the Sevenoaks District Cycling Strategy are a range of potential future route options across the district, with one of these potential routes being a link between Edenbridge and Chiddingstone. The purpose of this would only be to serve leisure activities.

The limited frequency of public transport services and insufficient existing cycling and pedestrian infrastructure raise doubts about the feasibility of achieving sustainable travel objectives.

7. Parking and Vehicle Management

The document lacks detail on how parking demands will be managed within the development, potentially leading to overspill issues in surrounding residential areas. The omission of a clear parking strategy conflicts with the projected high reliance on private vehicles and raises concerns about congestion and neighbourhood impacts.

The estimates for cars per dwelling is in our opinion too low and in reality, a significant number of 2 bedroom properties will have 2 cars per household. Demand for visitors parking always exceeds the provision made. There will also be parking taken by users of the station who will want to avoid the car parking fees levied by Network Rail. There are no enforcement measures or considerations given to preventing vehicle parking migrating into residential road surrounding the development.

8. Effectiveness of Proposed Travel Plans

The developer references the inclusion of travel plans in many comparable developments but provides no evidence that these have successfully reduced car dependency or promoted sustainable travel in practice. The "Travel Plan" data (Page 2) indicates that despite their presence, private vehicle usage remains the dominant mode of transport in similar developments, with total trip rates for vehicle occupants at 6.160 (Page 15) vastly outstripping sustainable alternatives.

The monitoring and compliance framework, limited to five years and relying on voluntary measures, lacks robustness, casting doubt on the long-term effectiveness of the proposed Travel Plan.

In conclusion the Travel Assessments and Travel Plans provide insufficient measures or concrete evidence that they are mitigating the pressure this development will put on town amenities, local roads, air quality, the environment and public safety.

- Increased Road Traffic – incomplete assessment and few mitigations
- Public Transport – not fit for purpose and limited by insufficient Investment being agreed
- Cycling and Walking Infrastructure restricted by current road and path widths
- Strain on Local Facilities – no clear plan to address increased demand
- Environmental and Visual Impact – risk to biodiversity, flooding, and open spaces
- Ineffectiveness of Travel Plans – No proof they will be implemented or reduce car dependency
- Community Concerns – insufficient consideration or mitigation plans to reduce the negative impact for local residents and their quality of life.

ARBORICULTURAL_IMPACT_APPRAISAL___METHOD_STATEMENT-3575780

The proposed development at Four Elms, Edenbridge, raises significant concerns for the local community regarding its potential impact on landscape character, biodiversity, and quality of life. While the plan outlines mitigation measures, such as new tree planting and robust protection for retained trees, the loss of mature trees and hedgerows, particularly those with ecological and aesthetic value, may irreversibly alter the area's identity. Key removals, including boundary and visually prominent trees, threaten biodiversity and the natural screening that supports privacy and limits noise pollution. Although replacement planting is promised, it will take decades for new trees to provide the same benefits as mature ones.

Tree losses are not "minor" or "insignificant" to local character, especially where there is no detailed cumulative impact assessment or clear evidence of long-term ecological offsets. The assurances of landscaping improvements and mitigation are broad and lack specifics on timelines, species selection, and enforcement mechanisms. Additionally, the potential for post-development tree pressures, such as felling due to shading or perceived risks, raises questions about the durability of the proposed greenery. Stronger commitments to tree preservation orders and transparent monitoring are needed to safeguard retained trees.

The community will face both immediate and long-term consequences, including changes in visual amenity, potential flood risks from reduced soil stability, and disruption during construction. The loss of public-access hedgerows and green spaces could diminish local engagement with nature, while dust and noise pollution might adversely affect quality of life. Therefore, there must be enforceable planning conditions and independent Arboricultural oversight, ensuring the development aligns with the area's character and ecological health.

ECOLOGICAL_IMPACT_ASSESSMENT-3575739

The proposed development at Four Elms, Edenbridge, raises critical concerns for the community regarding the loss of habitats, the potential inadequacy of mitigation measures, and the encroachment on the Metropolitan Green Belt. The project involves removing valuable grasslands, hedgerows, and pond habitats that support protected species like great crested newts, bats, and reptiles. While mitigation plans are outlined, the lack of detailed, enforceable strategies for habitat restoration and long-term monitoring creates uncertainty about their effectiveness. The development also risks runoff pollution to nearby watercourses and threatens ecological connectivity.

Key claims from the developer, such as the designation of certain habitats as "low value" and reliance on District Level Licenses for species protection, should be challenged. These assessments overlook the interconnected role of these habitats in sustaining biodiversity and fail to address cumulative impacts on nearby Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites (LWSs). Promises of biodiversity net gain through new landscaping are vague and unlikely to compensate for the loss of mature ecosystems within reasonable timeframes.

For residents, the development risks reducing accessible green spaces, increasing human activity near sensitive ecological areas, and introducing disruptive construction impacts like noise and light pollution. There must be enforceable commitments to habitat protection, transparent monitoring, and the inclusion of green infrastructure that directly benefits the community while preserving the area's ecological and rural character.

LIGHTING_ASSESSMENT-3577351

The proposed lighting strategy for the Four Elms Road development raises key concerns for residents regarding light pollution, ecological impacts, and the adequacy of mitigation measures. The shift in lighting classification from rural to suburban will increase brightness levels, potentially disrupting the rural nightscape. Sensitive ecological habitats, such as tree belts and hedgerows used by bats, are particularly vulnerable, and while mitigation measures like dimming and low-colour temperature LEDs are proposed, they lack concrete implementation plans and enforcement mechanisms.

The developer's claims that lighting will have minimal ecological and amenity impacts, rely on broad recommendations rather than specific, site-based assessments. Ambiguities around how low-lux levels near bat habitats will be maintained and how glare and spill will be minimized for nearby homes require detailed clarification. Moreover, the potential disruption from construction is an additional concern.

The development risks degrading the rural character of the area, reducing dark skies, and introducing glare and spill into residential areas. There should be independent monitoring, and detailed site-specific plans to ensure that both ecological integrity and quality of life are protected. Stricter controls on lighting near sensitive areas are essential.

TREE_MANAGEMENT-3575784

Core concerns here include potential gaps in monitoring and enforcement, as arboriculturist supervision is periodic and may not catch unauthorised changes. Protective measures like fencing and ground protection lack site-specific details, raising questions about their effectiveness.

There is a question over the sufficiency of periodic arboriculturist oversight and the assumption that mitigation measures like new planting fully offset the ecological value of removed or damaged mature trees. The lack of detailed, enforceable protection plans for construction phases, such as excavation or service installation near root protection areas, also needs to be scrutinised. There should be stronger guarantees of compliance and site-specific mitigation strategies.

The development risks diminishing local green cover, reducing biodiversity, and exacerbating soil and water management issues, which could lead to flooding and destabilised landscapes. There should be robust enforcement, detailed tree protection plans, and substantial compensatory planting with semi-mature trees to preserve the ecological and community value of the area.

TREE_PROTECTION_PLAN-3575782

There are concerns about enforcement, tree removal, and compensatory planting. Several moderate-quality trees are scheduled for removal, potentially impacting local biodiversity and reducing canopy cover. While protective measures such as construction exclusion zones (CEZs) and root protection areas (RPAs) are included, the plan lacks specific monitoring and enforcement details, leaving room for potential non-compliance or accidental damage during construction.

There is challenge to the categorisation of certain trees as low-quality or unsuitable for retention, which may undervalue their ecological and community importance. Additionally, the

compensatory planting plan is insufficient to replace the benefits of mature trees, such as shading, biodiversity, and carbon storage, in the short to medium term. The reliance on periodic arboriculturist supervision, without clear enforcement mechanisms, also raises concerns about consistent adherence to tree protection measures.

DRAINAGE_-_CATCHMENT_PLAN-3575772

The scale and density of the proposed development suggests a significant increase in impermeable surfaces compared to the current state. This includes extensive residential areas, roadways, and parking facilities. A particular concern is how surface water runoff from these new impermeable surfaces will be managed without overwhelming the existing water features or creating flood risks for both new and existing properties in the area.

DRAINAGE_-_OUTLINE_SURFACE_WATER_DRAINAGE_STRATEGY-3575774

This development threatens to disrupt an established natural drainage system, including multiple ponds, streams, and ditches.

From a community impact perspective, the proximity of flood zones 2 and 3 mean that, residents face potential increased flood risk.

These issues directly affect property values, safety, and quality of life for current and future residents, particularly during extreme weather events that are becoming more frequent due to climate change.

DRAINAGE_-_FLOOD_RISK_ASSESSMENT___OUTLINE_SURFACE-3577176

The developer's own assessment acknowledges a "residual risk" from existing drainage basins potentially flooding the site, while simultaneously proposing substantial ground level modifications of up to 2 meters in some areas to enable their drainage strategy. The combination of these factors could fundamentally alter local drainage patterns and increase flood risk to existing properties. These concerns are compounded by the fact that crucial technical assessments - including detailed ground investigation and construction phase management - have been deferred to later stages.

Of particular concern for residents is the developer's reliance on a private management company for long-term maintenance of drainage features, with no clear details on costs or responsibilities. The assessment acknowledges three new watercourse crossings will be constructed within predicted flood zones.

The planning authority should ask for:

- Detailed ground investigation results before planning determination, rather than accepting deferral to later stages.
- Specific details about long-term maintenance arrangements and associated costs.

The developer's own document provides clear evidence that key aspects of flood risk management have yet to be fully assessed or planned.

DRAINAGE_-_APPENDIX_A-3575760

The site's eastern boundary directly interfaces with the River Eden, and the flood maps clearly show part of the site falling within Flood Zone 3 (highest risk). The document acknowledges that existing flood defences "may be overtopped or fail," raising questions about the safety and sustainability of development in this location.

The presence of Flood Zone 3 within the site boundary triggers the requirement for both Sequential and Exception Tests under the National Planning Policy Framework. This raises

questions as to why this specific site, with its high flood risk areas, has been selected over potential alternative sites in lower risk areas. Can it be demonstrated that no reasonably available alternative sites exist in areas of lower flood risk?

Looking at the Risk of Flooding from Rivers and Sea map, the eastern portion of the site shows concerning levels of flood risk, with areas classified as 'high risk' (greater than 3.3% annual probability of flooding). Development on this site here could compromise both current flood management systems and the natural function of the river corridor.

DRAINAGE_-_APPENDIX_B-3575764

Images demonstrate that portions of the site intersect with both Flood Alert and Flood Warning Areas. According to the definitions provided in the map legend, these are areas "where flooding is expected to occur" and where residents are officially advised to "protect themselves and their property." This designation is particularly significant as Flood Warning Areas specifically "define locations within the Flood Warning Service Limit that represent a community at risk of flooding."

From a community impact perspective, the development threatens to compromise existing flood management systems in an area already identified as vulnerable. The technical documentation explains that these zones are not merely theoretical but represent areas where flooding is anticipated. The map provides evidence of the site's challenging relationship with flood zones, particularly given its proximity to the River Eden.

DRAINAGE_-_APPENDIX_C-E-3575766

The area sits on Weald Clay with documented shallow groundwater levels (less than 3m below ground) and has a proven history of flooding incidents affecting both properties and roads. Between 2014-2020, Southern Water have recorded multiple incidents of infrastructure failure, including sewer blockages and flooding.

The existing foul water network is already showing signs of stress, with documented incidents of system failure and flooding spanning multiple years. Any significant new development may add considerable pressure to this already strained infrastructure.

Given the documented evidence of recurring flooding and infrastructure problems, there needs to be concrete evidence - not just assurances - that the development won't exacerbate these issues. The technical requirements specified by KCC for drainage solutions may be difficult or impossible to achieve while maintaining the proposed development density.

DRAINAGE_-_APPENDIX_G-I-3575770

The flood modelling shows areas within the development boundary experiencing flood depths ranging from 150mm to over 1m, with particularly severe flooding along the eastern boundary. Two streams flow through the site, and the Environment Agency explicitly confirms the land falls within designated flood zones, with Flood Zone 3 (highest risk).

While the Environment Agency has acknowledged the modelling methodology, their letter notably directs developers to follow Flood Risk Standing Advice (FRSA), suggesting additional scrutiny is required.

DRAINAGE_-_APPENDIX_J-3575762

Flood mapping demonstrates multiple overlapping flood considerations for the proposed development site. Map 1 shows the site boundary intersects with areas of surface water flood risk. While the document states, "flooding from surface water is difficult to predict" and acknowledges that "local features can greatly affect the chance and severity of flooding," these uncertainties raise valid concerns about how any development could reliably manage surface water drainage.

The site's position within reservoir flood extent areas, as shown in Map 2, adds another documented risk factor. While the document notes this represents "a credible worst-case scenario," the site's location within both 'wet day' and 'dry day' flood extents requires careful consideration. Map 3 provides additional context, showing the site boundary intersects with recorded flood outlines from previous flooding incidents, demonstrating this area has experienced actual flooding events rather than just theoretical risk.

Given these documented flood risk factors, development proposals must explain how they would address the statement that "local features can greatly affect the chance and severity of flooding."

The caveat that these datasets are "indicative not definitive" suggests more detailed local authority assessment would be required. Until comprehensive evidence demonstrates how these multiple flood risks could be effectively managed without impact, the documented flood patterns raise significant concerns about development in this location.

DRAINAGE_APPENDIX_K-L-3575776

The drainage plans for this development show some important details. Basin G-1 is expected to overflow during heavy storms, according to the modelling. Across the drainage system, which covers over 8 hectares, the design includes several Hydro-Brake® control devices. None of the basins are designed to allow any natural infiltration of water into the ground. The system is built to handle a 100-year storm plus a 45% increase due to climate change. Basin D, the largest part of the system, will have inflow rates of 260.6 litres per second and needs storage for over 3,500 cubic meters of water.

This raises several concerns. Why does the design assume no natural infiltration in any of the basins? Why is Basin G-1 predicted to overflow? With such a large and complex system, how will the Hydro-Brake® devices and other infrastructure be maintained over time?

The system’s size and the large water volumes involved also raise questions about its reliability and who will be responsible for its upkeep. We need to know who will pay for maintenance, how existing properties will be protected, and what happens if the system faces storms beyond its design capacity. These issues suggest that the drainage plans should be independently reviewed and include more details about long-term management.

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_01-3575797

The utility consultation shows UKPN's budget estimate of £2.6M for connection to Edenbridge Primary Substation comes with specific caveats - they state it was prepared without site visits or system studies. The documentation shows the number of dwellings has increased from 425 to 443 since the original proposal [now outdated as number of dwellings proposed is 450].

UKPN explicitly states that "a full network study is required to confirm the proof of concept and/or the extent of reinforcement which will be necessary." The works will require civil

engineering, with UKPN specifying "substation bases, substation buildings where applicable and the excavation/reinstatement of cable trenches." UKPN indicates their portion of work is planned as a 12-month program.

This raises the following questions:

- What assessment has been done of how the increased dwelling numbers affect power requirements?
- What would be the extent and duration of disruption from the civil works?
- Given UKPN's statement about no site visits or system studies, what additional assessments might be needed?
- How might the results of the full network study affect the 12-month timeline?

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_02-3575798

SES has assessed the proposed development at Four Elms, revealing significant deficiencies in the existing water infrastructure. The technical evaluation concluded that the development "fails the capacity check," with documented pressure reductions. These findings indicate that the current network is unable to accommodate the additional demand without substantial reinforcement. Fire flow rates from the nearest hydrant (ID: H10206469) were recorded at 43.7 l/s, further emphasizing the strain on existing infrastructure and the need for enhancements.

SES Water has also identified discrepancies in the developer's estimated demand figures compared to their own calculations. SES noted that the developer's estimates were "significantly less than the calculated demand based on averages." SES Water has requested more accurate data to allow further modelling, as the existing developer estimates are insufficient to support detailed reinforcement planning. This highlights the challenge of aligning infrastructure planning with the developer's projections.

The scale of the proposed development necessitates a phased approach to construction, with utility providers limiting phases to a maximum of 200 units. While this phasing may temporarily alleviate some pressure, it does not eliminate the need for substantial reinforcement. The cumulative demand from multiple phases has not yet been fully assessed in the available documentation.

The adequacy of fire safety measures remains uncertain, particularly given the significant pressure deficiencies identified in SES Water's evaluation.

This raises the following questions:

- How will the developer reconcile their estimated demand with SES Water's calculations to ensure accurate planning for infrastructure requirements?
- What specific reinforcement measures are planned to address the documented pressure reductions and accommodate the increased demand?
- Who will then also conduct comprehensive modelling to assess the cumulative impact of phased construction on the water network as well as other potential construction going on at the same time?
- Does the identified reduction in pressure affect compliance with statutory fire safety requirements, and how will this be mitigated?

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_03-3575799

Based on the WSP Utility Statement dated October 2024, there are infrastructure capacity concerns that warrant careful scrutiny in the planning process. Most critically, SES Water has explicitly confirmed they have "no capacity within their current network" to support the development's requirements, with modelling showing pressure reductions of up to 5.3m that "fail the capacity check". Additionally, UKPN has identified the need for £2.6 million in electrical infrastructure reinforcement, while Southern Water has yet to confirm foul water network capacity.

Multiple utility providers require further detailed site surveys and modelling before confirming feasibility. The presence of major infrastructure requiring diversion, including an 11kV overhead power line and 600mm concrete pipe, suggests construction disruption that isn't fully addressed in the current documentation.

The extensive infrastructure reinforcement works needed across multiple utilities implies prolonged construction disruption. Many assessments remain outstanding, including Southern Water's full evaluation, suggesting that the full scope of community impact cannot yet be properly assessed.

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_04-3575800

The proposed development raises several concerns regarding planning and risk mitigation based on the information provided in the utility documentation. The documents explicitly acknowledge inaccuracies in the underground utility mapping, with the utility provider emphasising that the precise location of mains, pipes, and other apparatus must be established on-site before any excavation. It is further noted that no liability is accepted for errors or omissions in the provided plans.

The safety implications of these risks are compounded by the developer's apparent reliance on the documentation’s disclaimer of accuracy. However, the extent to which the developer has taken proactive measures, such as conducting detailed consultations with utility providers or performing thorough on-site risk assessments, is unclear. If such measures exist, they are not evident in the documentation reviewed. This raises an important question: has the developer undertaken sufficient due diligence to identify and mitigate the risks posed by inaccuracies in utility mapping?

Another critical issue concerns the absence of any robustly presented emergency response plan for incidents such as utility damage. Without clear plans for responding to emergencies or addressing long-term maintenance and liability for infrastructure damage, there is potential for service disruptions, structural damage, and increased costs to the community.

Potential environmental impacts are also a significant concern, particularly given the proximity of the development to sensitive areas such as Sites of Special Scientific Interest (SSSIs). Construction activities such as excavation could destabilise soil, alter water flows, or introduce pollutants that could adversely affect these protected ecosystems. What measures, if any, has the developer proposed to mitigate ecological harm and protect the biodiversity within nearby SSSIs?

The development could further exacerbate environmental risks if construction alters groundwater flow or drainage patterns, potentially impacting water systems several miles away. While the risk of such outcomes is plausible given the sensitivity of the surrounding ecosystems,

it is not definitively established in the reviewed materials. This raises a need for clarity on whether environmental assessments have adequately accounted for these longer-range impacts.

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_05-3575801

The presence of Bonded Asbestos Cement (BAC) pipes and the possibility of other unknown materials containing asbestos are explicitly acknowledged in the utilities assessment. These materials are known to pose risks, but the document does not provide specific mitigation measures for handling or addressing potential environmental and health hazards associated with them. This lack of detailed plans raises an important question: are there sufficient safeguards in place to manage the risks of asbestos contaminating soil or groundwater?

Additionally, the mapping of utility infrastructure is subject to inaccuracies, as explicitly stated by Southern Water, Openreach, and UK Power Networks. Each organisation disclaims responsibility for the accuracy of their maps and emphasizes that the precise locations of pipes, cables, and other utilities must be verified on-site before any excavation begins. This acknowledgment suggests that developers and contractors must undertake significant due diligence, but it also raises the question of whether this process adequately mitigates the risks of service disruptions or safety hazards during construction.

Southern Water and UK Power Networks both state that the burden of determining utility locations rests with those performing the work. While this approach is standard in such assessments, it prompts the question: does this shift of responsibility unfairly transfer risks to the local community and utility providers, potentially leading to financial and safety consequences?

Furthermore, the utilities assessment underscores that developers must cover the costs of protecting or diverting existing infrastructure. This could indirectly impose financial burdens on future residents, a concern that warrants closer examination. Are there clear and transparent plans in place to prevent these costs from being unfairly passed on to the community?

Finally, while the document outlines general safety protocols, such as the handling of live electrical cables and asbestos, it does not include detailed contingency plans for site-specific risks. This raises another critical question: are there provided safety measures and risk assessments sufficiently robust to address the challenges unique to this development site?

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_06-3575802

UK Power Networks explicitly states that the accuracy of the utility data cannot be guaranteed. The document clarifies that the positions of underground and overhead infrastructure may have shifted since installation, requiring manual verification of exact locations during excavation. The potential for inaccuracies in the infrastructure data is a material issue that could lead to unforeseen complications during development.

The assessment does not present detailed information about the capacity of the existing sewage system to accommodate the increased demand posed by the proposed development. Without such an evaluation, it is not possible to definitively assess whether the infrastructure can support additional loads without adverse environmental or operational impacts.

The document emphasizes that all cables must be treated as live until proven otherwise and warns of the need for precautions to avoid damaging infrastructure during excavation. While these are standard practices in utility management, the extent to which these challenges could

disrupt the project timeline or impose risks on local residents remains unclear. Will the developer be held to account to plan for contingencies to address these risks and minimise potential disruption to the community?

FOUL_SEWAGE_AND_UTILITIES_ASSESSMENT_07-3575803

The document highlights a disclaimer from UK Power Networks, stating that they "do not warrant that the information provided...is correct," and that users rely on it at their own risk. This indicates a potential for inaccuracies in the provided utility data. Additionally, it is noted that the "position of the apparatus shown on this drawing is believed to be correct," but users are instructed to verify the exact location using approved tools and trial holes before any excavation.

The document does not provide any detailed strategies from developers on how they plan to mitigate risks associated with the potential inaccuracies in utility infrastructure data. It relies instead on general guidance, such as trial holes and avoidance tools, to manage these risks. Does this reliance on standard verification methods constitute a sufficient approach to proactively addressing these issues?

Could the uncertainties in utility locations lead to service disruptions, increased construction risks, or public safety concerns? If existing infrastructure were to be damaged due to inaccurate data, what contingencies are in place to prevent long-term inconveniences, such as power outages or extended repair times, for residents?

ODOUR_AUDITS-3575696

The odour impact assessment for the proposed development at Four Elms Road examines the potential implications of proximity to the Edenbridge Wastewater Treatment Works (WwTW) on residential suitability. The analysis is based on three odour surveys conducted at different times under varying environmental conditions, as outlined in the IAQM guidance on odour assessment for planning. The first two surveys, conducted in May and June 2024, detected no odour at any of the 48 survey points. However, the third survey in September 2024 recorded detectable odours at seven locations near the WwTW boundary, with a maximum odour intensity of 5 ("very strong") and exposure percentages reaching up to 43% at some points. These conditions were determined to result in "substantial adverse" impacts for high-sensitivity residential receptors.

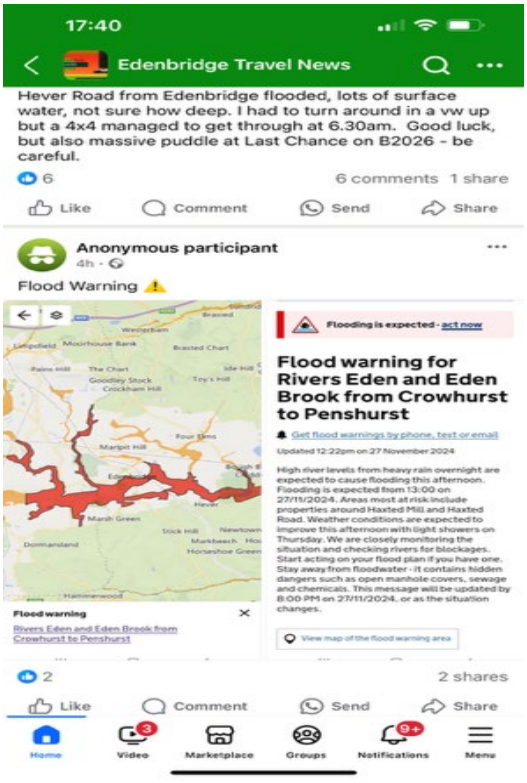
The report's findings suggest that while odour impacts were absent or negligible during two surveys, variable environmental conditions, as demonstrated in Survey 3, may result in significant odour exposure at the site under certain circumstances. This raises questions about whether the absence of odour in the first two surveys can conclusively support claims of the site being free from odour constraints.

The developer’s submission emphasises the results of the first two surveys, where no odour was detected, to argue that the site is suitable for residential development. However, this interpretation may overlook the variability in environmental conditions that contributed to the findings in Survey 3. To what extent should the potential for high odour exposure during specific conditions inform the overall assessment of residential suitability? Additionally, how should mitigation strategies account for these episodic but significant odour exposures?

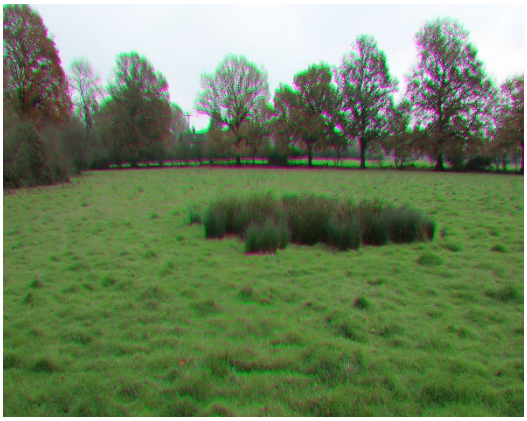
The report also highlights receptor density as a factor that could amplify the perceived impact of odour, given the proposed development scale. This raises questions about whether cumulative effects, including potential complaints, should be a central consideration in evaluating the site’s viability. Furthermore, the presence of "substantial adverse" impacts at certain receptor locations suggests that mitigation measures, such as buffer zones and alternative site layouts, may be necessary to align the development with planning policy requirements.

The assertion that these findings contradict claims of no odour constraints should be explored in the context of how such constraints are defined in planning terms. Would additional odour testing under varied conditions provide a clearer understanding of the development's compatibility with the site?

Photographs showing evidence of flood zones near the site and in Edenbridge



Photographs of the Four Elms Site / wetlands.



ARCHAEOLOGICAL_ASSESSMENT-3575736

The developer's archaeological assessment raises significant concerns about the timing and adequacy of heritage investigation at this site. While the report acknowledges the site is "highly likely to contain evidence of agricultural cultivation" dating from the Medieval period and lies adjacent to a documented Roman Road, it suggests deferring crucial archaeological evaluation until after planning permission is granted. This approach appears to conflict with Sevenoaks Policy EN4, which requires proper archaeological assessment for areas of suspected importance. The developer's own report states "further information will be required to clarify the presence or absence of archaeological evidence," yet paradoxically recommends proceeding with permission before obtaining this critical information.

Policy EN4 clearly requires that "an archaeological assessment must be provided to ensure that provision is made for the preservation of important archaeological remains/findings." The developer's proposal to defer detailed archaeological evaluation until after planning permission directly conflicts with both the letter and spirit of this policy requirement.

The mandatory language ("must") coupled with the objective to "ensure" preservation demonstrates that proper evaluation should inform the planning decision, not follow it. This interpretation is reinforced by EN4's stipulation that "applications will be assessed with reference to the historic and/or architectural significance of the asset" - an assessment that cannot be meaningfully conducted without first understanding what archaeological remains exist on site. The developer's own admission that "further information will be required to clarify the presence or absence of archaeological evidence" (p.19), while simultaneously suggesting this work be conducted post-permission, fundamentally fails to satisfy EN4's requirement to ensure preservation through informed decision-making. The policy's clear intention is to establish archaeological significance as a prerequisite for determining appropriate preservation measures, not as an afterthought to be addressed through planning conditions.

Failure to conduct a proper evaluation to inform the planning decision, could result in irreversible damage to heritage assets before their significance is fully understood. The assessment acknowledges the site "retains its archaeological potential" and historic landscape character, including parliamentary enclosure boundaries that contribute to local distinctiveness.

HERITAGE_STATEMENT-3575735

The developer's proposal to increase housing density from the previously approved 340 to 450 dwellings represents a significant intensification that threatens the historic setting of Grade II listed Skinners Farmhouse. While the developer acknowledges "a very low level of less than substantial harm," this assessment appears to minimise the cumulative impact of a 32% increase in housing density on an area with documented historical connections to the listed building. Notably, the previous outline permission was granted without any heritage assessment, and the current proposal fails to demonstrate how it "conserves or enhances" the heritage asset's setting as required by Sevenoaks Policy EN4. The developer's own admission of harm, even if characterised as 'very low level,' appears to conflict with this policy requirement for conservation or enhancement.

The developer's key claims warrant challenge, particularly their dismissal of heritage impacts as "very low level" despite acknowledging the site's "moderate to low contribution" to the farmhouse's significance and admitting the development would cause "erosion of the rural-agricultural character." This appears to conflict with both local policy EN4 and national planning requirements that "great weight should be given to the conservation of designated heritage assets." The developer's attempt

to rely on the previous outline permission while substantially increasing density without fresh assessment of cumulative impacts is particularly concerning.

For the local community, the development represents permanent loss of historic agricultural land that has helped define the area's character since at least 1844. The proposed 32% increase in housing density beyond the previously approved scheme will intensify pressure on local infrastructure while eroding the rural buffer between existing residents and new development. The heritage statement acknowledges the site's contribution to the farmhouse's agricultural setting. The proposed increase in housing density from the previously approved scheme will affect this documented heritage relationship, with the developer acknowledging this would cause 'erosion of the immediate-wider western agricultural character setting context to the listed farmhouse.

AGRICULTURAL_LAND_CLASSIFICATION___SOIL_RESOURCES-3575737

The proposed development site presents significant concerns that warrant careful scrutiny. Most critically, the report confirms that 7.2 hectares (20%) of the site qualifies as Best and Most Versatile (BMV) agricultural land, which national planning policy specifically seeks to protect. Furthermore, this is an interim report with pending laboratory analysis results, making any immediate planning decisions potentially premature. This is particularly concerning as the final soil analysis could reveal an even higher proportion of BMV land.

The technical evidence raises substantial concerns about drainage and flood risk. The document identifies "slowly permeable" soils, "fluctuating groundwater levels," and multiple water features including ponds and ditches across the site. Given these characteristics, development could exacerbate local drainage issues and increase flood risk to surrounding properties. The report also confirms the land's current active agricultural use for sheep grazing, with established features including clover-rich grassland and multiple ponds that contribute to local biodiversity.

From a community perspective, the development would result in the permanent loss of productive agricultural land that contributes to local food production and rural character. The developer's report notably fails to address the economic impact on local farming operations or the cumulative effect on the area's agricultural viability. Critical decisions appear to be proceeding before completed technical information is available, as evidenced by the interim nature of the report and outstanding laboratory analysis. Focusing on decisions before the final soil analysis results are available and and the permanent loss of BMV agricultural land that serves both economic and environmental functions in the community, must be taken into consideration.

Comments on the Arup Report [previous evidence base for outline planning approval]

On pp. 81-82 of the Arup Report for this site it says "RA-3 is located to the east of Edenbridge, in the western part of Green Belt Parcel 18. However, a small sub-area in the west of the Parcel (RA-3) may score weakly if considered in isolation. This area is just 6 hectares according to the report, just over 50% of which is already occupied by houses and the new health centre. A generous estimate of the area that would be included in the proposed development is therefore a maximum of 3 hectares. The area available to develop that *may* perform weakly against the NPPF criteria comprises just 8.5% of the proposed 35.63-hectare development.

Given the small percentage of the site that may be considered weakly performing, this detail in the current Planning Statement is difficult to understand:

"7.17 - The Local Plan 2040 Regulation 18 Stage 2 consultation recognises the challenges faced by the district in meeting its housing needs given the high proportion of land designated as Green Belt (93%). However, reference is made in the foreword and elsewhere to a focus on using land which is poorly performing. In approving application 20/02988/OUT, the Council recognised that the site was assessed as "poorly performing". At Paragraph 50 of the Officers report to Committee, in referencing the proposed allocation of the site under the Council's 2019 Submission Local Plan, the Officer stated, "The release of this site was linked to the Council's development strategy of releasing green belt sites for development where they were adjacent of one of its four main settlements and where they were poorly performing green belts and would provide existing identified infrastructure provision". It remains the case that the development of this Green Belt site is necessary to meet the district's needs accordingly."

Why has the whole site has been assessed as weakly or poorly performing given evidence to the contrary in the reports by Arup, uploaded to the evidence base for previous outline planning, but missing from the evidence base for this new planning application?

BIODIVERSITY_NET_GAIN_ASSESSMENT-3575738 / 3606418

The Biodiversity Net Gain Assessment reveals significant environmental concerns that directly impact our community. Most critically, the development results in a substantial 38.62% loss of habitat units (70.66 units), falling well short of the legally required 10% biodiversity net gain. While the developers acknowledge this deficit, they propose vague solutions of purchasing offset credits or finding alternative locations, with no specific commitments to where or how this compensation will be delivered locally. This represents a direct loss of natural space that our community currently enjoys and relies upon.

The development's scale (33 hectares) and scope (housing, youth centre, allotments, and station car park) will fundamentally alter the local environment, including impacts on protected species like Great Crested Newts, culverting of natural waterways, and changes to an area officially recognized as strategically significant for biodiversity. The developer's own assessment confirms the presence of valuable habitats in "good condition" and a veteran tree with high ecological value, which will be retained. However other mitigation strategies largely rely on off-site compensation rather than preserving these existing natural assets. Of particular concern is the lack of detail regarding how the significant shortfall in biodiversity units (88.95 units) will be addressed within our local area, potentially resulting in the permanent loss of accessible natural space for residents.

This proposal deserves robust challenge under planning policy SP11 of the Sevenoaks Core Strategy, which explicitly requires "no net loss of biodiversity." The developer's current approach not only fails to meet this requirement but also inadequately addresses the community impact of losing substantial green space and natural habitats. There should be specific commitments for local biodiversity compensation, detailed habitat management plans, and stronger protections for existing natural features before this development proceeds.

Further Comments

The relocation of the potential school site is not adequate justification for building 110 more houses, especially as the additional land that would be developed would be ideal for BNG.

Should the development go ahead, the land for the additional houses should remain within the constraints of the previous outline planning with increased density if required but the newly proposed area should be used to achieve 10% BNG on-site as opposed to being used for additional housing.

These parcels of land are identified as TN1i and TN1j on the map in the appendix and are shown on the map as areas of modified grassland bounded by hedgerows, hedgerows with trees and trees. Modified grassland provides great scope for improvements to biodiversity. There are two ponds in this area which could also provide great scope for improvements to biodiversity.

The western boundary of TN1i includes two trees with bat roosts. Part of this area is already identified as a biodiversity improvement area. Using the whole of these parcels for BNG would increase the beneficial impact of BNG as there would be greater opportunities for wildlife of all types to forage and better connectivity. Providing BNG adjacent to the main development site would help to mitigate the profound damage that will be inflicted on the environment through habitat destruction and fragmentation.

Using TN1i and TN1j for BNG would have the additional benefit of preserving the allotments (adjacent to parcel TN1j) as a tranquil area, prized for recreational and amenity value and the sound of birdsong. This tranquil space must be protected if the development is to comply with Paragraph 191 of the NPPF.

There are concerns about the ecological impact on the whole site. The Ecological Impact Assessment has identified it as a key reptile site. The aquatic invertebrate population is of county value, the bats may also be of county value and great crested newts and hedgehogs are known to be present. Locally, the site is known to be important for migratory birds.

The developer proposes to fell one of the bat roost trees. It is not clear from the plans and documentation why this is necessary. This should be challenged.

It is difficult to see how this development can be anything other than profoundly damaging in relation to nature conservation and biodiversity.

STATEMENT_OF_COMMUNITY_INVOLVEMENT_02-3575790

The development proposal raises significant concerns due to its reliance on unsubstantiated claims and vague commitments, particularly regarding infrastructure impact. While proposing an increase from 340 to 450 homes, the developer makes unevidenced assertions that KCC have deemed additional traffic generated by the site to be 'manageable' within the existing highway network. Most critically, the cornerstone community benefit, a secondary school, lacks any firm development timeline, with land merely being "reserved until 2040" and dependent on future funding applications to the Department for Education.

The document uses problematic qualifying language throughout, promising "significant new planting" and "ecological enhancements" without measurable targets or specific commitments. The developer's response to infrastructure concerns relies heavily on future Community Infrastructure Levy payments rather than guaranteed improvements.

The consultation data reveals significant community opposition to aspects of the development, though exact numbers are notably absent from the charts. The community impact extends beyond the immediate housing increase, potentially affecting traffic flow, local services, and environmental quality.

STATEMENT_OF_COMMUNITY_INVOLVEMENT_01-3575791

The developer's revised proposal represents a significant intensification of the previously approved scheme, increasing housing numbers by 32% (from 340 to 450 dwellings) without adequate justification or comprehensive impact assessments. The consultation process itself raises serious concerns, with a limited 5-week summer consultation period, single evening event (possibly excluding working parents, evening shift workers and those with caring responsibilities), and distribution of only 562 leaflets for a development of this scale. This appears to be a minimal compliance approach rather than meaningful community engagement as required by the Localism Act and NPPF.

Three critical areas warrant immediate challenge:

- First, the developer relies heavily on outdated 2017 consultation data (76% support) to justify the current scheme, despite substantial changes to both the proposal and local context. Additionally, there does not seem to be any detailed methodology for analysing and incorporating current feedback from the July 2024 consultation.
- Second, the infrastructure implications of the increased density - including school capacity, traffic impact, and service provision - lack detailed assessment or clear delivery timelines.
- Third, the visual and environmental impacts of the higher-density scheme on local character, wildlife habitats, and residential amenity are inadequately addressed in the consultation materials.

The developer's current approach appears to prioritise speed over thorough community engagement, potentially undermining the local planning process's integrity and residents' interests.

STATEMENT_OF_COMMUNITY_INVOLVEMENT_03-3575792

The developer's revised proposal reveals significant changes to the original plan that warrant careful scrutiny. Most critically, the school delivery timeline has been pushed to "2031 at the earliest," tied to 70% completion of housing rather than community need. While the developer presents these changes as responsive to Kent County Council's requests, they only provide a selective quote about "delivery timing" without full context or consideration of community impact. We have also not seen the request from Kent County Council to the developer, which is especially significant considering NEDRA are in possession of a letter from the Head of Education at KCC saying we will NOT get a new school without development in the region of 2000-2700 new homes in Edenbridge. This lack of transparency, combined with the misalignment between the developer's selective framing, underscores the necessity for full disclosure and a thorough reassessment of the proposal to ensure it genuinely serves the long-term interests of Edenbridge residents

The Section 106 agreement, which should protect community interests, lacks specific commitments - particularly regarding affordable housing percentages, infrastructure timing, and mitigation measures. The developer's language is notably vague when describing benefits ("various infrastructure," "other contributions") while being precise about increased housing numbers. This contrast raises concerns about whether community benefits are being diluted while development intensifies. The relocation of the school site and expansion into additional Green Belt land is presented as a simple administrative change, without addressing the practical implications for traffic, access, and local services.

These fundamental changes to the development's scope and timeline have been presented without evidence of meaningful community consultation or impact assessment.

RESIDENTIAL_SURVEY_QUESTIONNAIRE_1-3575697 / 98 COMBINED SUMMARY

Despite the developer claiming that residents are in support of this development, a review of these documents show residents have demonstrated overwhelming opposition to the proposed development, with significant concerns centred on three critical areas.

First, there are serious infrastructure capacity issues: the existing healthcare services are already strained, the town is experiencing traffic congestion, and public services are at "breaking point" according to multiple residents. The developer's proposal lacks concrete commitments or timelines for infrastructure improvements, particularly regarding the promised secondary school, which residents insist must be delivered before any housing development begins.

Second, the environmental and community impact raises major concerns. The site includes flood zone areas and supports endangered species, yet the developer's mitigation strategies remain vague. The proposal also affects Green Belt land, with only 6% identified as "weakly performing" according to Sevenoaks District Council's own assessment. The development's scale (increasing from 340 to 443 homes) appears to be justified primarily by the school relocation, which residents argue is misleading since it represents a net increase rather than a reallocation of housing numbers.

Third, there are significant issues with the delivery and funding mechanisms for promised community facilities. The developer's commitments to the youth club (£200,000 contribution), station improvements, and other community facilities lack clear implementation timelines or full funding arrangements. Residents express scepticism about these "empty promises," noting similar unfulfilled commitments from previous developments. The absence of specific safeguards or conditions to ensure delivery of these facilities before housing occupation is a critical weakness in the proposal. The development's impact on local character and services, combined with uncertain delivery of benefits, suggests the proposal in its current form would

harm rather than enhance the community's interests.

RESIDENTIAL_SURVEY_QUESTIONNAIRE_1-3575697

1. Housing Development Concerns: While some respondents support housing development beyond the already approved 340 homes, many express objections due to fears of overburdening local infrastructure, including roads, healthcare, and utilities. These concerns align with official planning materials emphasising sustainable infrastructure capacity and environmental impact mitigation.
2. Secondary School Relocation: Opinions on relocating the secondary school to expedite site development are divided. Those opposing cite disruptions to current educational facilities, increased traffic, and insufficient justification for prioritising land availability over community stability. These objections reflect planning considerations about maintaining essential services and ensuring cohesive community integration during transitions.
3. Community Facilities and Masterplan: Support for additional community facilities, such as recreational areas and public spaces, is conditional on assurances that these developments will adequately meet population growth demands. Scepticism about the revised masterplan arises from a perceived lack of specificity, concerns about ecological degradation, and doubts about effective implementation, echoing official planning guidance on transparency and environmental sustainability.

- Against Further Housing Development:
    - Strain on infrastructure, including roads, schools, and healthcare services.
    - Environmental concerns, such as potential harm to green spaces and local wildlife.
    - Overcrowding and loss of rural character in the area.
- Challenges with Secondary School Relocation:
    - Concerns about increased traffic and logistical challenges during the transition.
    - Uncertainty about the benefits of expedited land availability.
    - Potential impact on the quality of education and local community cohesion.
- Regarding Additional Community Facilities:
    - Desire for specific plans addressing recreation, healthcare, and transport.
    - Hesitation due to past unmet commitments in similar developments.
    - Emphasis on facilities complementing sustainable urban design principles.
- Objections to the Revised Masterplan:
    - Insufficient detail on ecological and infrastructural safeguards.
    - Distrust in developers' commitment to delivering promised features.
    - Need for more participatory planning to align with local needs.

RESIDENTIAL_SURVEY_QUESTIONNAIRE_1-3575698

1. Housing and Infrastructure Strain: A significant proportion of the community opposes the proposed increase in housing above the already approved 340 units, citing pressures on existing infrastructure such as transport, healthcare, and schools. These objections align with official planning concerns about sustainable development and adequate resource provisioning.
2. Environmental Preservation: Numerous comments emphasised the need for ecological sensitivity, with worries about the impact on wildlife habitats, natural connectivity, and flood risks. Such concerns resonate with planning guidelines that stress biodiversity conservation, sustainable drainage, and environmental safeguards in new developments.
3. Community Facilities and School Relocation: While there is some support for added community facilities, respondents question their adequacy to meet growing demands and the feasibility of funding. Concerns about the secondary school relocation reflect fears of long-term planning disruptions and insufficient provisions for education, echoing official planning tenets of service continuity and participatory design.

4. Opposition to Additional Housing
    - Increased housing would strain already overburdened local resources.
    - Concerns about traffic congestion and lack of integrated transport planning.
    - Loss of rural character and community identity.
5. Environmental and Flood Risk Concerns
    - Potential harm to endangered species and natural habitats.
    - Calls for better planning of flood zones and sustainable drainage systems.
    - Need for safeguarding and connecting wildlife corridors.
6. Community Facilities
    - Doubts about funding and timely delivery of proposed youth clubs and scouts facilities.
    - Perceived inadequacy of proposals to meet demographic growth needs.
7. School Relocation
    - Concerns about educational disruption and traffic increases during construction.
    - Scepticism about the genuine benefits of expedited land delivery for the school.
    - Long-term doubts over land-use guarantee if school development stalls.

CRIME_PREVENTION_DESIGN_OFFICER-3584958

The Crime Prevention Design Officer's report emphasizes the need to incorporate Secured By Design (SBD) principles into the Four Elms development to mitigate risks of crime, anti-social behaviour, and community safety issues. Core concerns include the potential for poorly surveilled spaces, inadequate lighting, and vague commitments to security measures such as robust door and window standards, secure parking, and effective public space design. Without detailed implementation and monitoring plans, there is a risk that crime prevention strategies may be inadequately enforced or overlooked.

There are ambiguities in how natural surveillance will be ensured, particularly for parking areas, pathways, and open spaces. Additionally, the reliance on future adherence to security standards like PAS 24 for windows and doors requires clarity on how this will be enforced. Lighting plans lack detail, which could undermine both safety and compliance with CPTED (Crime Prevention Through Environmental Design) principles. Gathering areas, especially for young people, need clearer strategies to prevent noise and anti-social behaviour affecting nearby residents.

The development could significantly impact residents' quality of life if these issues are not addressed. Poorly designed public spaces and insufficient security measures may increase the risk of crime or fear of crime, eroding community trust. Residents should advocate for detailed, enforceable plans for lighting, surveillance, and public space design, alongside robust security standards, to ensure the development fosters a safe and welcoming environment for all.

The lack of a police station in Edenbridge underscores significant shortcomings in the proposed design for the Four Elms development. The Crime Prevention Design Officer's report places considerable reliance on the enforcement of Secured By Design (SBD) and Crime Prevention Through Environmental Design (CPTED) principles to mitigate risks of crime and anti-social behaviour. However, without a consistent local policing presence to monitor or respond effectively to incidents, these measures are insufficient on their own. Recommendations such as periodic surveillance, CCTV, and secure boundaries rely heavily on proactive compliance and maintenance, which may be challenging to sustain without police oversight or immediate intervention capability

Landscape [HISTORIC_LANDSCAPE_TYPES-3575725 / LANDSCAPE___VISUAL_IMPACT_APPRAISAL-3575731 / LANDSCAPE___VISUAL_IMPACT_APPRAISAL appendices 01-11

Comments on the Planning Statement for the Four Elms Road development 24/02765/OUT regarding the impact on the landscape

Paragraphs 7.32 and 7.33 of the Planning Statement suggest that the site "does not have a strong rural character and therefore, while there would be some encroachment, this would be limited at most." 30% of the total site was assessed for the Arup report on green belt. Overall, the areas assessed were deemed to have a "a strongly un-spoilt rural character." The remainder of the site is even more un-spoilt and rural in character.

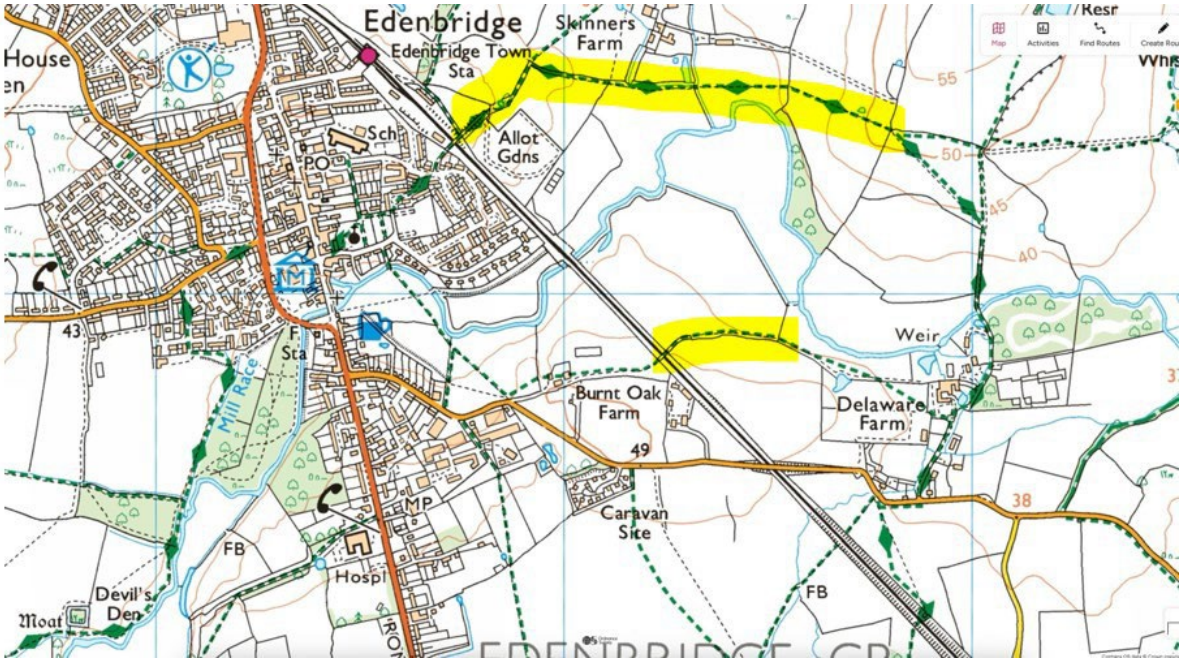
View northeast across the field adjacent to the allotments.

This rural scene will be replaced by housing if the development is extended by 110 houses. The public right of way follows the left-hand edge of this field. This public footpath forms part of the Delaware Farm Walk available on the Visit Edenbridge website https://www.visitedenbridge.com/walks/eden-valley-walk-4/

Part of this walk would in future be through a housing estate instead of the countryside. Views further on in this walk would be affected by the housing estate. Yet another public footpath will be urbanised, resulting in a loss of amenity to the community.

The image above is a panorama, taken from a public footpath on the Delaware Farm Walk, showing the location of the proposed extension to the development which would be beyond the field boundaries ahead and to the right. The appearance is clearly rural. The extension to the development site will be a major encroachment into the countryside. Green fields, hedgerows and trees will be replaced by a housing estate clearly visible from walking routes on this side of Edenbridge. Building on these fields would be contrary to the NPPF green belt purpose a) to check the unrestricted sprawl of large built-up areas and purpose c) to safeguard the countryside from encroachment. Furthermore, it would alter the character of the area.

The yellow highlighting on the map below shows the locations where views, and the experience of the countryside, would be affected by an additional 110 units. The experience and countryside views would be profoundly impacted in the northern area, highlighted in yellow and on the allotments. The additional 110 units would have a very strong adverse impact on the countryside to the east of Edenbridge.



The Landscape and Visual Impact Appraisal (LVIA) does not consider how this landscape is used and appreciated by local residents. From a local perspective, it is not true to say that the revised application will have a "very slight/negligible adverse effect" as stated on page 58 of the LVIA. The additional 110 units would certainly amount to harm over and above what was previously accepted by the Local Authority, contrary to the opinion expressed in paragraph 7.73 of the Planning Statement. The claim in paragraph 7.73 of the Planning Statement that "The Proposal is therefore considered to accord with Policies GI1 and EN1 of the ADMP and Policy LO8 of the CS" must therefore be erroneous.

Paragraph 191 of the NPPF states:

“Planning policies and decisions should also ensure that new development is appropriate for its location considering the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

Building 110 additional homes would result in housing immediately to the northeast of the allotments. The houses would intrude visually and inevitably there would be more noise. The allotments are much prized by plot-holders for their rural outlook, recreational and amenity value, and their tranquility. Birdsong is the predominant sound as trains only pass twice an hour. The allotments are an important resource contributing to the physical and mental well-being of residents of Edenbridge.

Extending the development site alongside the allotments would mean that this tranquil amenity and recreational area is not appropriately protected. It would result in a significant adverse impact on the quality of life. It would therefore be against the policy set out in paragraph 191 of the NPPF.

Comments on the Green Belt

Paragraph 7.17 of the Planning Statement for the Four Elms Road development says:

" The Local Plan 2040 Regulation 18 Stage 2 consultation recognises the challenges faced by the district in meeting its housing needs given the high proportion of land designated as Green Belt (93%). However, reference is made in the foreword and elsewhere to a focus on using land which is poorly performing. In approving application 20/02988/OUT, the Council recognised that the site was assessed as “poorly performing”. At Paragraph 50 of the Officer’s report to Committee, in referencing the proposed allocation of the site under the Council’s 2019 Submission Local Plan, the Officer stated, “The release of this site was linked to the Council’s development strategy of releasing green belt sites for development where they were adjacent of one of its four main settlements and where they were poorly performing green belts and would provide existing identified infrastructure provision”. It remains the case that the development of this Green Belt site is necessary to meet the district’s needs accordingly."

There is no evidence to support the assertion that the whole site is poorly performing green belt. So, the previous planning approval was granted on false premises. 24/02765/OUT is therefore not in accordance with the policies set out above and should not be approved. Please see below for the green belt research carried out that has uncovered this issue.

These reports have been examined to reach this position:

https://www.sevenoaks.gov.uk/downloads/file/3816/sevenoaks_stage_2_green_belt_assessment_-_main_report

https://www.sevenoaks.gov.uk/downloads/file/3817/sevenoaks_stage_2_green_belt_assessment_-_annex_report

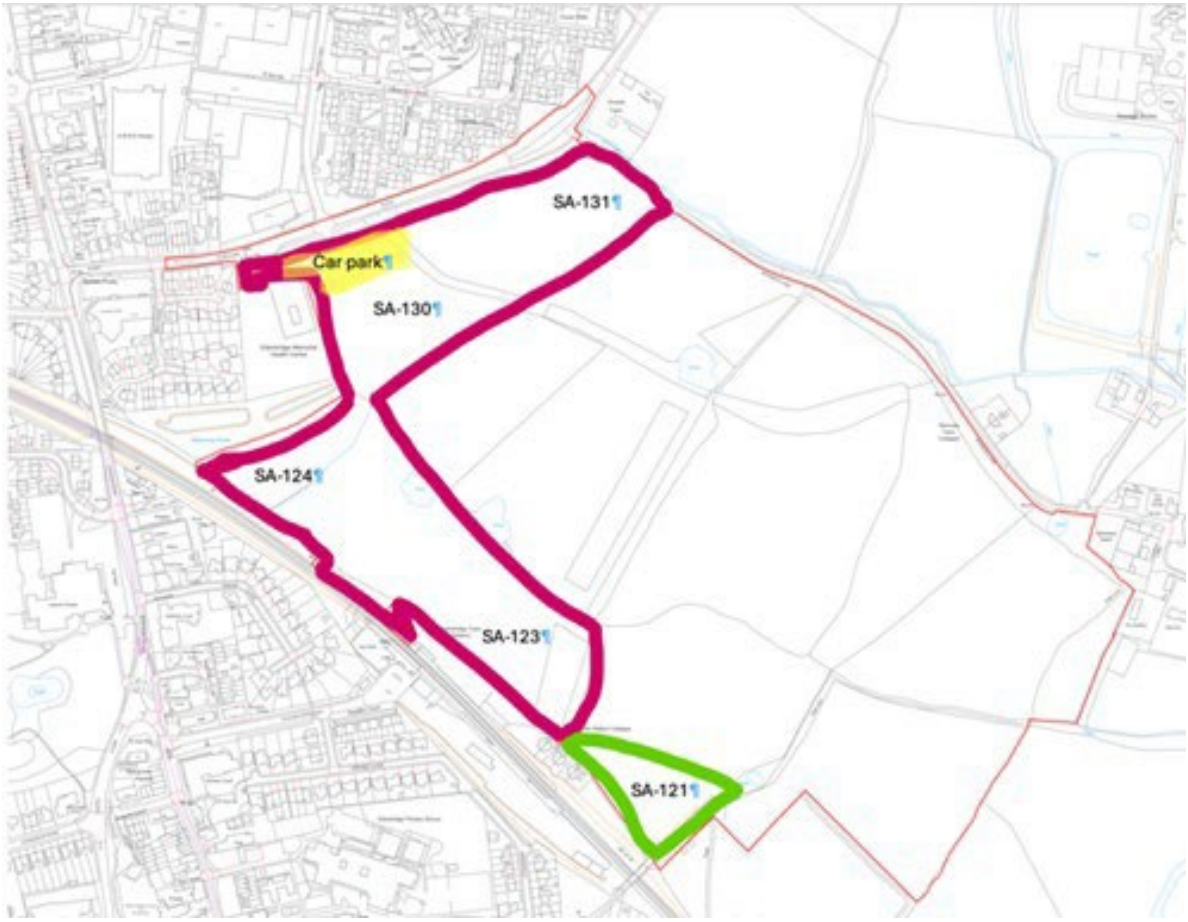
https://www.sevenoaks.gov.uk/downloads/file/3879/sdc_green_belt_assessment_report_-_methodology_and_assessment_jan_2017

https://www.sevenoaks.gov.uk/downloads/file/314/green_belt_supplementary_planning_document
On pp. 81-82 of the Arup Methodology and Assessment Report (Jan 2017) is the following information.

"RA-3 is located to the east of Edenbridge, in the western part of Green Belt Parcel 18. The wider Parcel scores strongly against the NPPF purposes. Although it does not meet Purposes 1 or 4, it prevents encroachment into open land of a largely un-spoilt, rural character (Purpose 3). The parcel also makes a weak contribution to Purpose 2, forming a small part of the less-essential gap between Edenbridge and Sevenoaks. ***However, a small sub-area in the west of the Parcel (RA-3) may score weakly if considered in isolation***. This area, at the edge of Edenbridge, includes an area of existing development and has an urban character (Purpose 3). This includes dwelling houses and a community centre. Although the land immediately to the east is undeveloped, it does contain some hard standing (in the north) and has a stronger visual relationship with the urban fringe than the wider countryside as a result of established dense hedgerows. RA-3 is of a relatively small scale and effectively falls within the existing settlement footprint of Edenbridge and thus plays no role in preventing coalescence between settlements (Purpose 2). Recommendation: Parcel 18 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the west at the edge of Edenbridge (RA-3) may score weakly and could be considered further."

RA-3 is just 6 hectares according to the Arup report. Of these 6 hectares, the parcel labelled SA-130 appears to be the only portion still available for development. SA-130 is just 1.97 hectares. **The area Arup considered for development that *may* perform weakly against the NPPF criteria in isolation comprises just 5.5% of the proposed 35.63-hectare development.**

The site map below is annotated to show the parcels of land considered in the Arup report.



Arup's findings are summarised below:

SA-121 1.22 hectares

"The sub-area performs strongly against the NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration."

SA-123 (4.02 ha), 124 1.02 ha), 130 (1.97 ha),131 (2.55 ha) These areas were deemed to perform strongly against the NPPF purposes but make a less important contribution to the wider Green Belt. SA-123 was "Recommended for further consideration in combination with SA-124, SA-125, SA-126, SA127, SA-128, SA-129, SA-130 and SA-131 as RC-18" [SA-125-129 have already been developed so are not part of this application.]

According to the Arup reports, it seems that these areas were recommended for further consideration purely on the grounds that they make a less important contribution to the wider green belt. Where is the evidence for this land being poorly performing green belt?

SA-121, 123, 124, 130 and 131 comprise roughly 50% of the earlier proposal 20/02988/OUT, maybe less. They comprise 30% of the current proposal which will occupy 35.63 hectares of green belt. As the land that was not considered shares many of the characteristics of SA-121, it seems reasonable to assume that had it been considered, it would have been assessed as strongly performing green belt.

94.5% of the site should be regarded as strongly performing according to the evidence in the reports. It is therefore contrary to the NPPF and local planning policy to build on it. Given the uncertainty as to whether a secondary school will really be built, it is difficult to see how very special circumstances can be seen to overturn the requirement to protect strongly performing green belt.