



How to Object to Housing Developments in Otford

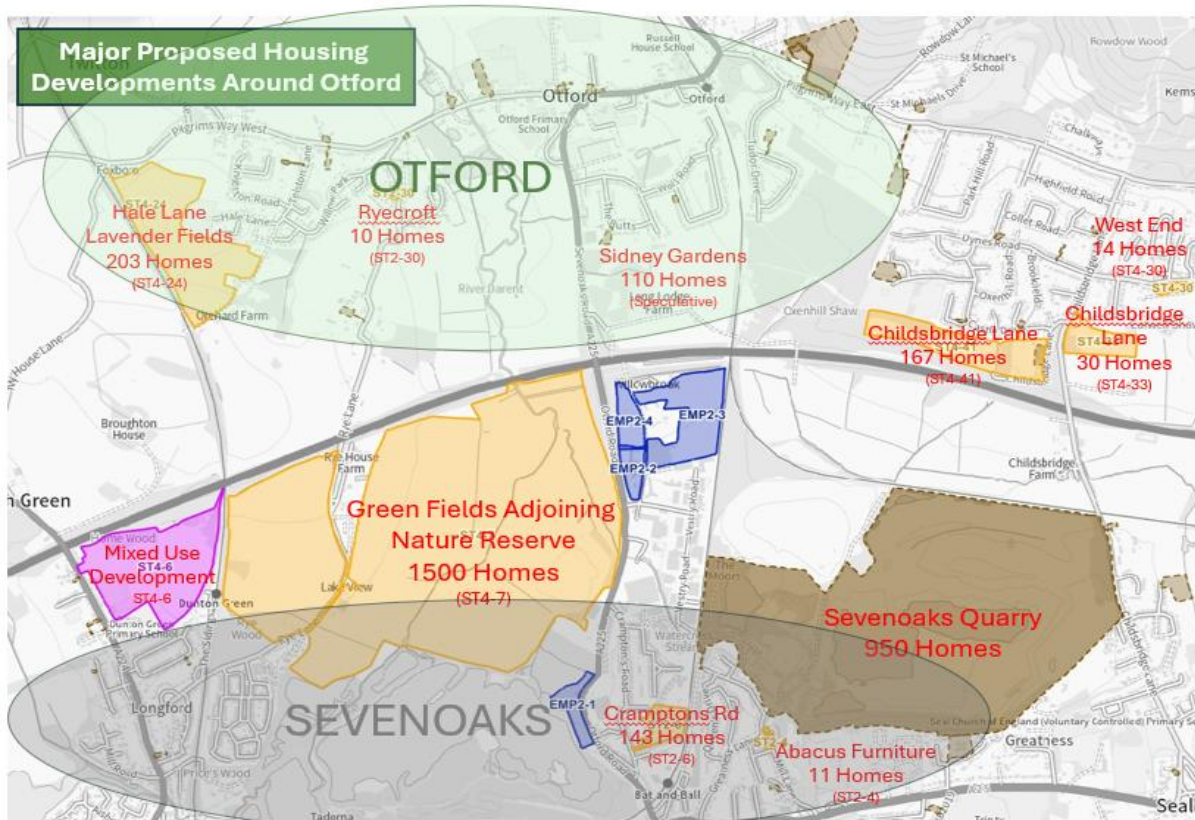
Sevenoaks District Council Regulation 19 Consultation

Introduction

Sevenoaks District Council's Local Plan proposes Green Belt building on a massive scale around Otford. At the previous Regulation 18 Public Consultation, opposition to the plan was overwhelming with over 90% of survey respondents being against the large developments. The District Council is now pushing the plan forward to the next stage. Regulation 19 Consultation is your chance to by-pass the District Council and provide **evidence** on the **soundness** of the plan directly to the Planning Inspectorate. This document aims to help you understand how to respond to the Consultation and what objections and evidence may be effective. You can find a link to the consultation at <http://otfordsociety.org/development>.

Where are Houses Proposed to be Built?

This map shows the main proposed development locations that would add over 4,000 homes to the existing 1,400 in Otford and potentially join us to Sevenoaks, destroying the village's separate identity.





What are the Specific Locations, Numbers and Site References?

The table below summarises the major sites within 2 miles of Otford. SDC have changed the site references between Regulation 18 and Regulation 19, so be sure to use the reference in the Regulation 19 column of the table in your Consultation response.

	Regulation 18		Regulation 19	
	Reference	Dwellings	Reference	Dwellings
Ryecroft	OT1	7	ST2-30	10
Hale Lane Lavender Fields	OT2	150	ST4-24	203
Land North of Sevenoaks	SEV24	1500	ST4-7	1500
London Rd Dunton Green	SEV19	250	ST4-6	289
Cramptons Rd	SEV5	50	ST2-6	143
Abacus Furniture	SEV24	10	ST2-4	11
Hillingdon Avenue	SEV6	11	ST2-12	12
Bradbourne Vale Rd	SEV8	28	ST4-2	20
Chipstead Park	SEV23	32	ST4-3	40
W of Childsbridge Lane	KEM4	120	ST4-41	167
Childsbridge Lane	KEM3	20	ST4-33	30
West End	KEM5	181	ST4-30	14
Park Lane	KEM1	5	ST2-33	12
Baldwins Yard	NOA1	80	ST3-12	14
Regulation 18/19 Plan Totals		2444		2465
Sevenoaks Quarry	Sevenoaks Quarry			950
Fort Halstead	Fort Halstead			635
Land S/O Sidney Gardens	Land S/O Sidney Gardens			110
Additional Total				1695
Grand Total				4160

What Can I Comment on in the Consultation?

Because the Regulation 19 Consultation is about the **soundness** of the Local Plan it is important to use **evidence** in your response. This may sound daunting, but your personal everyday experience really is the best evidence for the Planning Inspectorate.

- Maybe you frequently get stuck in traffic at Bat & Ball, the chicane or other locations in the village?
- Do you find it difficult to get a Doctor's appointment?
- Have you struggled because of water supply issues or the hosepipe ban?
- Do you think that our village roads and lanes are too narrow for any more traffic?
- Are you a dog walker? Do you see rare wildlife on the local fields that are targets for development?

These are just a few examples – feel free to add your own ideas and wherever possible include details – photographs, letters or emails from utility companies, personal logs of traffic issues & wildlife sightings.



Potential High Level Objections to the Combined Impact of the Plan

As well as objecting to specific sites identified for development you are encouraged to comment on the cumulative impact of the whole plan on our village and area. There are many reasons why the plan will have a dramatic and adverse effect on our lives. We have listed some of the most obvious ones below, but the most important thing is for you to add your own words and add your own personal *experiences* and *evidence*.

Objection Ground	Practical angle to use
Roads & traffic (A225 and local junctions)	The plan doesn't set out clear evidence that specific junctions such as Bat & Ball can absorb traffic from thousands of homes; ask the Council to publish junction-capacity modelling for named pinch points. Evidence: Note specific junctions/times where you experience queuing or near-misses (e.g. "A225/High Street, weekday 8:15–8:45am, tailback past X"), with dates. Photos or short videos of congestion, especially at the level crossing, carry weight.
Water supply & stress	Para 4.49 confirms serious water stress district-wide, but no water company has confirmed capacity is deliverable at this scale — ask the Council to publish written confirmation from Southern Water/SES Water on capacity and timing before allocations are relied upon. Evidence: Any personal experience of low water pressure, hosepipe bans, or supply interruptions in recent years, with approximate dates.
Wastewater / drainage & sewage	Ask whether existing wastewater treatment capacity (not just water supply) has been assessed for the scale proposed, and whether upgrades are funded and phased ahead of occupation, not after. Evidence: Any personal experience of sewage smells, surface water flooding, or drainage problems near your property or on routes you use, with dates/locations.
GP / healthcare capacity	No GP capacity evidence or Integrated Care Board confirmation appears anywhere in the plan — ask which practices are expected to absorb thousands of new patients and whether the ICB has confirmed this is deliverable. Evidence: Your own or family members' experience of appointment wait times at your local surgery, with rough dates (e.g. "two-week wait for a routine GP appointment in [month/year]").
School places	Policy ED1 defers detail to the Infrastructure Delivery Plan, described as a "living document" still being updated — ask for confirmed, funded school place capacity tied to occupation phasing, not just financial contributions in principle. Evidence: If you have children, or know of local families, note current oversubscription, catchment changes, or waiting lists at named local schools.



Flood risk / drainage	Roughly a quarter of the Otford Road strategic site sits in Flood Zone 3; ask whether the sequential and exception tests were properly applied to the buildable footprint (not just the site boundary) and whether that evidence is published. Evidence: Personal knowledge of flooding along the River Darenth or Rye Lane — dates, locations, water levels, or photos from past flood events.
Green Belt / landscape setting & separation	Argue the site fails to "square off" existing development or preserve genuine separation between settlements (per the reasoning tested in the Marlow Film Studios decision), and that the grey belt classification for a specific site hasn't been evidenced site-by-site in the published plan. Evidence: Describe the open character of the specific fields/gaps concerned from personal use — dog walking, cycling, views from named footpaths — with photos if possible.
Public transport & rail capacity	Ask whether Dunton Green, Bat & Ball, and Otford stations (and connecting bus services) have confirmed capacity for thousands of additional commuters, or whether this relies on undelivered "sustainable transport solutions." Evidence: Note current overcrowding on specific train services or bus routes you use, with times/dates.
Community, sports & leisure facilities	The Playing Pitch Strategy already identifies a net shortfall in pitch provision — ask how this is reconciled with major new housing before additional demand is added. Evidence: Personal experience of waiting lists, pitch/hall booking difficulty, or overcrowded facilities you or your family use.
Air quality & environmental nuisance	Ask whether cumulative air quality impacts from the additional traffic have been modelled for residential streets and school routes, not just strategic roads. Evidence: Personal observations of traffic-related nuisance (idling, congestion, dust) on routes near schools or your home, with locations.



Potential Objections for Each Site

Below is a practical objection matrix for the three sites that will have the greatest impact on Otford. **ST4-7** (1,500 houses on Green Fields between Sevenoaks and Dunton Green), **ST4-24** (Hale Lane Lavender Fields) **and ST2-30** (10 houses at Ryecroft), The matrix is built around the issues that are most persuasive under current Grey Belt policy. The strongest objections are the ones that tie directly to policy tests: whether the land is truly Grey Belt, whether the scheme harms openness and settlement gap, and whether access, drainage, ecology and infrastructure can realistically support the proposal.

Which Objections are Strongest for Which Sites?

Objection Ground	ST4-7 Green Fields	ST4-24 Lavender Fields	ST2-30 Ryecroft	Practical angle to use
Not Grey Belt / wrong policy category	High	High	N/A	Argue the land is ordinary Green Belt countryside, not previously developed land or land that the Grey Belt definition is meant to capture
Harm to Green Belt openness	High	High	N/A	Emphasise permanent urbanisation, loss of rural separation, and the scale of built form compared with the existing village edge
Conflict with Local Plan strategy	High	High	Low	Say the site should not be allocated unless the council can show it is the least harmful and most sustainable option under the emerging plan
Access / highway safety	Medium	High	Medium	For ST4-24, focus on narrow lanes, pinch points, construction traffic, and emergency access; for ST2-30, focus on visibility, turning, and cumulative traffic impacts
Traffic congestion in village	High	High	Medium	Use the village network, school run, station access, and queueing impacts as cumulative evidence rather than a general complaint
Flood risk / drainage	Medium	Low	Low	Point to low-lying land, surface-water management, and downstream effects where the site is close to the Darent floodplain or other sensitive drainage areas
Landscape / rural character harm	High	High	Low	Stress the loss of countryside setting, views, field pattern, hedgerows, and the village edge character that makes Otford distinct



Biodiversity / habitat corridor harm	High	High	Low	Refer to hedgerows, field margins, woodland edge, wildlife movement, and cumulative habitat loss between the sites
Infrastructure capacity	High	High	Low	Ask for proof on schools, GP provision, wastewater, water pressure, and local roads; weak infrastructure evidence helps the objection
Deliverability / land assembly / abnormal constraints	Medium	High	Medium	Most useful if the site needs third-party land, road realignment, demolition, or unusual access works that make the scheme speculative

Objecting to the Individual Sites Nearest Otford

ST4-7 1,500 Houses on Green Fields Between Sevenoaks & Dunton Green

This can be attacked particularly on **policy and landscape** grounds. ST4-7 is a vast site that would cause irreversible erosion of the Green Belt boundary and undermine the wider settlement pattern. There are clearly massive issues with the amount of traffic that 1,500 houses at this location would cause, but a strong objection is that the land is not being suitable for Grey Belt release in the first place. The site is adjacent to Sevenoaks Wildlife Reserve/Gravel Pits SSSI; ask for evidence that development at this scale won't cause indirect harm (disturbance, run-off, lighting) to the designated site. **Evidence:** Personal sightings of protected or notable species (birds, bats, otters) near the site or reserve, with approximate dates — even informal records add local knowledge the Council may not have.

ST4-24 203 Houses on Hale Lane Lavender Fields

ST4-24 is a strong site for a multi-point objection because it would be a large estate behind Hale Lane with access difficulties and heavy traffic implications. Lead with **not Grey Belt**, then move straight to access, construction traffic, and the danger of routing estate traffic through narrow village streets. Since no viable access route has been identified this site appears speculative and should not be allocated. This is also the best site to argue cumulative harm because the scale makes every impact more visible and harder to mitigate.



ST2-30 10 Houses in Ryecroft

ST2-30 is best attacked as a **small but still harmful edge-of-village incursion**. An objection could stress that even a smaller site can have disproportionate effects on the village approach, road safety, and the integrity of the gap between built-up areas. ST2-30 relies on the same infrastructure and road network as ST4-24 so that the combined effect makes piecemeal development unsound. The previous proposal for 7 houses already represented inappropriate density for this site, the increase to 10 houses makes this very difficult to justify.

Wording to Adapt

For each site, a strong opening sentence is:

- “This site is not Grey Belt within the meaning of current national policy and should remain protected Green Belt countryside.”
- “The proposal would cause unacceptable harm to openness, village character and the rural separation that defines Otford.”
- “The access and highway implications are not safely resolved, particularly when construction traffic and cumulative village traffic are considered.”

Best Evidence to Attach

The most useful attachments are the site maps, highway photos, flood/drainage evidence, and photographs showing views, hedgerows and the countryside edge. For ST4-24 especially, a plan showing where construction vehicles would have to go will often be more persuasive than a long general statement. Your every day experiences of infrastructure and utilities under pressure with specific examples are particularly powerful.

Who Can Respond to the Consultation?

EVERYONE in your household can submit their own response to the Consultation and numbers really do matter. Please make sure that **everyone responds individually** to maximise the response rate. Unusually, people of any age can respond to the Consultation, including children. For a plan proposing such permanent wholesale destruction of Green Belt some might feel it's highly appropriate for younger people to comment on the lasting effects of this.