

Knockholt Railway Station



*An investigation into the suitability and sustainability
of Knockholt Station as a transport hub to service
granted and proposed developments
of over 1500 additional dwellings in Halstead*

Introduction and Background

Halstead Parish Council (HPC) has undertaken an examination of Knockholt Station to ascertain its suitability to meet the demand of future developments including the granted Fort Halstead and the proposed Broke Hill developments, which together would add nearly 1500 dwellings to the village of Halstead, which currently comprises around 800 dwellings.

The inadequate service provided by this station was one reason a similar application was refused and dismissed on Appeal in 2021. The service provided by the station has remained virtually unchanged since then.

This document has been compiled because sections of the emerging NPPF (December 2025 draft) could be interpreted by some that the Broke Hill land is now Grey Belt and, further, that the proposed development of the site should be granted by default by reason that "house-building near well-connected train stations will receive a default "yes" if they meet certain rules", over-ruling Green Belt protections.

The ARUP survey (October 2025), uniquely in the whole of Sevenoaks District, placed Halstead and its sub-areas, including Broke Hill (sub-area KN-02), in the highest possible Green Belt performance rating (5/5) for purpose (a), to check the unrestricted

sprawl of the large built up areas, and 4/5 for purpose (c), to assist in safeguarding the countryside from encroachment.

Furthermore, SDC's emerging Local Plan 2042, Regulation 18, meets the housing requirement without the need to develop Broke Hill (MX/21/00047) and has rejected all but one of the nearby Pratts Bottom/Knockholt Station area Calls for Sites.

In view of the above facts, HPC considers the station should be subject to more detailed and informed scrutiny during the LPA's determination of the current proposal to develop Broke Hill.

This document comments on the findings of examination into various aspects of Knockholt Station to ascertain its suitability as a transport hub for major developments in the area and implications of it being sited close to Broke Hill proposal site. The surveys providing the information and findings are included as appendices to this document.

In addition to commenting on the potentially sole reason for granting the Broke Hill application on the grounds of being sited close to Knockholt Station, a review of the transport and highway layout around the station has also been included. HPC encourages SDC LPA to read Appendix C in its decision making process.

Knockholt Station



Knockholt railway station is the outermost station within the Greater London / TfL zone, on the line between London and Hastings. The trains are operated by Southeastern.

This rural station has two platforms. The station is category B3 (see Appendix A), having a degree of step-free access. There is step-free access to the northbound platform 1 but no step-free access to the southbound platform 2.

The ticket office is open on weekdays between 06:15 and 09:40 hr, closed at the weekend. Outside

the office opening times, there are no platform or sales hall staff present and no access to a waiting room. There are no shops, food or drink provision, toilets, telephones, left luggage, wi-fi nor taxi rank at the station. There is a 39-space chargeable car park with two disabled spaces, and further chargeable parking available on the highway outside the station.

There are typically two trains per hour in each direction throughout the day, including rush hours, the earliest weekday service leaving Knockholt towards London at around 05:30 hr, the latest train returning at around 00:30 hr. The journey time is typically around 50 minutes assuming one can alight at the station southbound.

If the track is closed, there is no other viable mode of public transport available to travel to or from the station area.

The train operator has confirmed that there are no plans to upgrade the station or services before the 2040s.

Studies undertaken

For this document, HPC focussed on three aspects of Knockholt Station

- Station Layout, Accessibility, Security and Safety
- Knockholt Station as a Well-Connected Station, Linked Public Transportation, Spatial Development Strategy
- Transport Assessment and Highways - Layout and Onward Travel around the Station and Concerns about Lack of Sustainability

Enclosures

Knockholt Railway Station Examination Findings

Knockholt Station Layout, Accessibility, Security and Safety	4
Knockholt Station as a Well-Connected Station and Linked Public Transportation	6
Transport Assessment and Highways - Layout and Onward Travel around the Station	8
Planning Determination Considerations	9
Summary and Conclusions	11

Appendix A

Knockholt Station Access, Safety and Security	A-1
Appendices 1-5	

Appendix B

Knockholt Station as a Well-Connected Station and Linked Public Transportation	B-1
--	-----

Appendix C

Transport Assessment and Highways - Layout and Onward Travel around the Station	C-1
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Knockholt Station - Layout, Accessibility and Security

Station Layout

Knockholt is a small rural station with two platforms. There are no platform staff and the ticket office is staffed during weekday morning rush hour and the station is otherwise completely unmanned. There is a 39 vehicle car park, including two disabled spaces, and an 8 cycle store on platform 1. There is an automatic ticket machine, emergency assistance call

points and two locked portable ramps for operation by assisting rail staff only.

Access to the southbound platform is by means of a footbridge over the tracks.

Safety Risks

Examination of this station exposed several areas of risk to the public and some areas do not conform with current regulations. Most significant of these issues are:

- A quarter of the trains are short, only having eight carriages. Northbound trains typically stop at the northern end of the platform. Passengers are required to move to the northern end of the platform to board the trains. Passengers with child buggies and those using wheelchairs or mobility scooters etc, have to cross the yellow platform safety line in order to proceed along the northbound platform due to the platform furniture and stairway. With fast trains passing through the station at up to 90 mph, this causes a vortex which significantly affects those within half a metre.
- the footbridge to access platform 2 is accessible only to able-bodied individuals. The steps are shallow and irregular and do not conform to current construction standards. The steps pose a significant trip hazard for this reason.
- There is further risk to the public due to the fact that there are no rail staff on site for the majority of the time. The station is little used at

off-peak times during the day. If a passenger fell or there were some other incident within the station, this would likely go unnoticed until the next passenger arrived.



Accessibility

Knockholt is a category B3 station meaning there is step-free access to platforms in one direction only (see Appendix A). There is no step-free access to the southbound platform. There is no room for a lift nor an alternative entrance to that platform. Whilst there are portable ramps on both platforms, these can only be used by rail staff to assist disabled passengers. As the station is unmanned most of the time, it is recommended to book online in advance

for assistance. The ramps would only assist passengers on and off the train, there is no facility to transport buggies / mobility vehicles over the footbridge so the ramp on platform 2 is effectively redundant and presumably present solely to meet regulations.

Infirm and disabled passengers, and those who cannot manoeuvre child buggies etc. over the footbridge, travelling on a southbound train to or

from Knockholt Station, are required to book their travel and request for assistance online in advance in order to avoid an additional charge to travel the two stops to Sevenoaks or Orpington first to access a lift over to, or from, the northbound track to return to or through Knockholt. If a disabled person arrives at the station requiring the ramp to access a northbound train and has not pre-booked assistance, they are required to call for a mobile rail staffing service that could take half an hour to arrive.



Bearing in mind the Broke Hill development proposal includes a 150 unit retirement village and nursing home, there is likely to be a higher proportion of elderly, infirm and disabled passengers using the station. If they wanted to travel by train, the online booking for travel and assistance procedure may be beyond their technical ability. Alternative forms of public transport are inadequate (see below); the only alternative for these individuals would be to book a taxi service either from the station (if they have a mobile phone and where it may take 10-20 for a taxi to arrive), or before setting out from home. The cost of a taxi to/from a destination or an alternative station may be prohibitive due to the cost.

The topography around the station also raises concerns regarding accessibility. The rise from the station to the top of the hill at the north end of the development is 27m, with a steep 13% climb, rising 20m over a horizontal distance of 150m from the road to the proposed development. The highest point in the site is a further 10m rise. A developer should bear this in mind if proposing a development specifically including elderly residents or parents with buggies etc. as the climb may be impossible. Broke Hill is an example of this. They would be forced to use their car or be dropped off despite the applicant repeatedly stating that the use of the car would be unnecessary and should be avoided.

Security



Although the station and car park are well lit during the operational hours of the station, female and frail people travelling alone tend to avoid using Knockholt Station, particularly at night time. It takes at least 2 minutes to alight from a southbound train and emerge on to the public highway. The area is not built up around the station; there is a house adjacent to the station, set well back from the road,

and a house opposite the station, shielded from view from the public highway by gates and fences. Otherwise there are two authorised traveller sites adjacent to the station.

There are several other concerns surrounding this station. There has been a murder on the platform at night, suicide jumps from the bridge and numerous thefts from and damage to vehicles in the station car park. These could arise for the following reasons:

- Knockholt Station not being visible from the public highway.
- There being no rail staff at the station outside the morning rush hour.
- There are CCTV cameras that record 24/7 on both platforms. However, the video is not constantly monitored but live viewing is only enabled if an incident were called in.

Knockholt Station as a Well-Connected Station and Linked Public Transportation

Knockholt Station lies within Greater London and falls under the jurisdiction of London Borough of Bromley (LBB). If development around the station is to be considered, Bromley Local Planning Authority could consider land parcels to develop in their own Administrative Area. If they decide not to utilise their own land, then they should engage in a spatial development strategy with neighbouring Administrative Areas.

Well -Connected Station

A well-connected station, as described in the emerging NPPF (December 2025,) must be located within one of the top 60 'travel to work areas' in England, ranked by Gross Value Added (GVA).

Being in an Administrative Area of a Greater London borough allows Knockholt Station to be considered as a well-connected station.

The emerging NPPF states:

Policy Details for Development Near Stations

- "Default Yes" Approval: Planning permission for residential developments around qualifying

stations will be automatically presumed in favour, even on green belt land, if they meet specific criteria.

- Qualifying Stations: "Well-connected" stations are defined as those within the commuting zones of the 60 most economically productive areas of the country (ranked by GVA) that have a minimum of two rail services per hour in each direction.
- Development Zone: The fast-track approval applies to developments within a 15-minute walk of a qualifying station.

Wider definition of a well-connected station

More generally, a well-connected station can refer to one that:

- Integrates with other transport modes (e.g., bus, tube, tram, cycling, walking networks) to provide new travel options for the community.
- Has strong links to a high number of jobs and opportunities, acting as a significant hub within the overall transport network.

- Is designed with sufficient capacity and good passenger flow to handle high volumes of people comfortably and safely.

Although not specifically stated in the NPPF, the reasonable maximum walking distance from the proposed development is 800 m. The maximum reasonable travel time to/from the TTWA is within 45-60 minutes.

Examination of Knockholt as a Well-Connected Station

Knockholt Station lies outside a settlement, the nearest settlement being Pratts Bottom, approximately 900m distant, so it is required to be well-connected.

The station meets the minimum requirements for a well-connected station as defined by the draft NPPF description. It does not meet the criteria of the general definition of a well-connected station due to

- the travel time for a disabled passenger exceeding 60 minutes (as they are required to travel to alternative stations), there only being step-free access to one platform,
- inadequate public transportation services serving the station (see below).

Well-connected commuting is generally considered to be within 45-60 mins. The Broke Hill proposal puts much emphasis on the proximity of the station and bus stops. The proposed retirement village and nursing home are likely to house infirm and elderly residents. If they were to travel to London, the train journey is around 50 mins. But to return, they would have to book their travel to enable them to travel to Sevenoaks without incurring an additional charge in order to travel back to Knockholt due to Knockholt Station's lack of accessibility to/from the southbound platform. That journey, irrespective of whether the slow or fast train is used from London stations to Sevenoaks, the journey back to Knockholt would take between 1hr 09min and 1hr 24min.

Linked / Connected Public Transportation

The draft NPPF does appear to place criteria on connected public transport service requirements around stations. It would be reasonable to expect there to be some form of public transportation around the station, at least as frequent as the train service. In Knockholt Station's case, a wait of up to around two hours for the only form of public transport serving the station, a rural bus service, and only within restricted hours during weekdays, should eliminate the station as being well-connected.

If either track is closed for emergency repair or due to an unforeseen incident, there is no viable alternative means of public transport to travel to or from the station location. Under these circumstances, buses are normally provided between Orpington and Sevenoaks depending on availability. This often results in long queues with waiting times up to an hour at those stations to access the replacement buses, which may or may not actually call at Knockholt Station.

DfT Transportation Connectivity Analysis

DfT has recently published a broad analysis of the connectivity of the population across England and Wales. The result for each area is set against a percentile of the entire population. The centre of the proposed Broke Hill Development has a rating of

38%, which puts it in the bottom 40% of the connectivity of the population of England and Wales to access to transportation for various travel modes and destination types.

Decision Maker

1. SDC could determine this application under current policy and framework, with similar controls to that of the 2018 application which proposed a similar number of dwellings. Knockholt Station's adequacy and sustainability would be assessed as previously and its part in the decision making process would be as before.

In October 2025, ARUP classified the site as highly performing Green Belt with the highest possible score for reason (a) to stop urban sprawl. It also scored highly in reason (c). Development on Green Belt land is deemed "inappropriate" and harmful by definition, and it should not be approved except in "very special circumstances". For development to be allowed, the benefits must "clearly outweigh" the harm to the Green Belt's openness and any other harm.

Should the application be refused and then taken to Appeal, it is possible that the new NPPF will be in place, in which case development around a well-connected station would come under consideration in the Appeal.

Under the current framework, LBB could have its own ideas for development around Knockholt Station if it considers the infrastructure is sustainable. For example, the land off Wheatsheaf Hill, land off Sevenoaks Road

(Costains and Hunters Den), Station Yard and part of Chelsfield Lakes Golf Course could be considered for development via compulsory purchase. They are mainly weakly performing green belt parcels and have no authorised development on them and all lie within 800 m of the station. If LBB decides these land parcels are not suitable, they could request cross-boundary co-operation to develop land within SDC.

2. An alternative approach in the decision making process would be to assess the application against the emerging NPPF. Along with that framework is the emerging Spatial Development Strategy (SDS). Here, neighbouring Administrative Areas work together to decide if there are suitable areas for development that cross the border between the Administrative Areas. Should the determination for Broke Hill be made under emerging policy and framework, then it should be a cross-border matter as the station in one Administrative Area is fundamental to the decision-making process in the neighbouring Administrative Area. It would therefore be a joint decision by LBB and SDC to decide whether Broke Hill is a suitable land parcel, set against the weakly performing undeveloped Green Belt sites within LBB.

Transport Assessment and Highways - Layout and Onward Travel

A comprehensive study of the real transport situation in the area was carried out over several months in 2024 and 2025.

Knockholt Station is not near any community facilities, the nearest medical services, supermarket, pharmacy, Post Office etc. being at least 3 miles distant in Green Street Green in the neighbouring London Borough of Bromley. There is no viable public transport service to access these facilities so inevitably, private cars will be used extensively from any nearby development, despite the proposals for Broke Hill encouraging cycling / walking, both completely inappropriate in this area and likely impossible for those living in the retirement village. The nearest shops, a Morrisons Mini-Mart (where stock is limited and over-priced) at the Esso fuel station, a sewing shop, a part-time Chinese food take-away, a tanning boutique and a kitchen flooring shop are one mile distant, at Pratts Bottom and fall a long way short of a consumer's day to day requirements.

There are serious concerns about the suitability and capability of the local lanes to carry significantly increased traffic flow. Of particular concern is Wheatsheaf Hill, a very steep, narrow, winding lane uphill connecting to Hewitts roundabout and the M25. Wheatsheaf Hill would be the obvious choice of route for residents and all delivery services etc. to and from Broke Hill, it being the shortest distance. The safer and more suitable route is two miles longer, utilising London Road, Old London Road and the A224 from Badgers Mount.

Hewitts roundabout is heavily used particularly during rush hours, exacerbated by the closure of the turning into Sevenoaks Road, forcing traffic and cyclists to the roundabout for onward travel towards Sevenoaks. This roundabout already has a

very poor safety record and the inevitable increase in traffic flow would only increase the risks.

The proposed highway layout outside the station is of concern. Sevenoaks Road is wide and generally free-flowing. It is under-used due to the opening of the M25 (Sevenoaks Road used to be the main A21 route to Sevenoaks) and since TfL closed the right turn into it from the A21, thereby diverting all the Sevenoaks-bound traffic to the Hewitts roundabout. The creation of over-specified, complex cycle and pedestrian lanes around Knockholt Station will cause congestion and potentially more risk caused by frustrated drivers navigating the layout.

The Broke Hill planning proposal plans to move the bus stops further from the station. Although the bus service is currently almost nonexistent, there being three weekday daytime buses approximately every 2 hours, moving the stops further from the station makes access to those with mobility issues and children more difficult.



Wheatsheaf Hill

Planning Determination Considerations

Green Belt

The Sevenoaks District area around Knockholt Station, being on the boundary with London Borough of Bromley, has already been classified as strongly performing Green Belt. The ARUP survey published in October 2025 placed it, uniquely with the district, as the highest rated (5/5) performing

Green Belt for purpose (a) - Urban sprawl and 4/5 for purpose (c) - Encroachment. It is a prime example of meeting the purpose of the Green Belt, including to prevent urban sprawl, and so Section 13, GB4, 1, a of the Draft NPPF should apply, taking precedence above all other policy.

Cross-Border Spatial Development Assessment

Broke Hill lies within Sevenoaks District Metropolitan Green Belt, not in the same Administrative Area as Knockholt Station, which has the status of being a well-connected station to a top 60 TTWA. Cross-border development is covered in the emerging Spatial Development Strategy between neighbouring Administrative Areas. Development around Knockholt Station at Broke Hill would be assessed jointly by LBB and SDC LPAs as the presence of the station is a fundamental part of the decision making process. If LBB LPA were to consider the weakly performing Green Belt areas within LBB, cross-border co-operation would not be

required because the station and development would be located in the same Administrative Area, LBB. The weakly performing Green Belt with no authorised development within LBB are land off Wheatsheaf Hill, land off Sevenoaks Road (Costains and Hunters Den), Station Yard; stronger performing Green Belt exists in Chelsfield Lakes Golf Course. One or more of these land parcels could possibly undergo compulsory purchase for development to fulfil the housing requirements around a well-connected station. All these sites are within 800 m walking distance of the station.

Infrastructure and other public transport

In Appendix B, Section 2's description of a well-connected station, additional criteria are included that should be considered vital when determining the application, namely that the rail service should integrate with other transport modes to provide new travel options for the community and is designed with sufficient capacity and good passenger flow to handle high volumes of people comfortably and safely. Knockholt Station does not meet these criteria.

With two trains per hour, the travel time from Knockholt to London stations is around 50 minutes increasing to up to 1 hr 28 mins for those requiring travel to alternative stations in order to access platforms in both directions. This puts Knockholt Station outside the general definition of a well connected station.

Whilst a station very close to a nearby development would make travelling/commuting by rail to London and Sevenoaks convenient (though time-consuming), consideration should also be focused on residents' need for access to facilities and travel anywhere apart from these routes.

One would assume a well-connected station should also be well connected with ongoing other means of public transport, for example, a bus service that complements the train service. There is not. There is a thrice daily weekday bus service that passes the station/Broke Hill in each direction between 9:35 and 14:44 hr. The service is of little use to Halstead, Knockholt or Badgers Mount commuters nor residents requiring transport to the nearest facilities and other villages. Furthermore, the bus service does not run at all at the weekend. Therefore a private vehicle will more than likely be required.

Station Accessibility Classification

When determining a planning application for development near a category B station, operational needs, passenger experience, local demographic accessibility needs, sustainability and community integration should be considered.

The station is not step-free and many of the residents of the Retirement Village proposed for

Broke Hill would be unable to use the southbound platform of the station. This would require online pre-booked additional travel southbound to Sevenoaks and back to alight at Knockholt, or north to Orpington and back to travel south through to Sevenoaks and beyond.

Well-Connected Area?

DfT has recently published a broad analysis of the connectivity of the population across England and Wales. The result for each area is set against a percentile of the entire population. The centre of the proposed Broke Hill Development has a rating of 38%, which puts it in the bottom 40% of the connectivity of the population of England and Wales (See Appendix B, Appendix 5)

A recent indicative study, available on the internet, further demonstrates Knockholt Station's poor connectivity performance. It calculated the journey times by public transport from all 597 rail stations and tram stops in Greater London to all six London group airports. The passenger weighted average airport journey time calculated that Knockholt had the longest average travel time of all the 597 starting points, making it the worst performing station in Greater London for travel to airports.

Summary and Conclusions

Knockholt Station lies within Greater London and it meets the minimum requirements for a well-connected station as defined in the draft NPPF (December 2025). However, it does not meet the criteria of the wider definition of a well-connected station.

Development around the station would be under the jurisdiction of London Borough of Bromley, as Plan Maker and Decision Maker. LBB may have its own ideas for development of the weakly and medium to high performing Green Belt land that lies within their boundary if the infrastructure is considered sustainable. If a development is proposed in a neighbouring Administrative Area, where the station is fundamental to the decision-making process of the proposed development, the neighbouring Administrative Areas should draw up a spatial development strategy for the assessment of cross-border land suitable for development, and should jointly determine planning applications on such parcels of land.

It should be noted that London Borough of Bromley has already objected to the Broke Hill Development proposal on the grounds of Green Belt performance, the undeniable impact the development would have on Bromley's own infrastructure and absence of medical provision on the application site, so would impact Bromley's already extremely stretched services. For this reason, it is highly unlikely that London Borough of Bromley would propose development around Knockholt Station.

The platform layout, furniture and steps are a risk to personal safety.

There is no step-free access to the southbound platform. Journey times from London exceed one hour for infirm or disabled passengers, or those otherwise unable to negotiate the steps over the tracks (child buggies etc.). The need to travel two additional stops in order to use a lift to access the track going in the opposite direction back to / through Knockholt. The requirement for elderly/infirm people to have to book travel and assistance in advance is unreasonable.

To make the station more accessible and surrounding roads adequate to meet the demand in order to make Knockholt Station a sustainable transport location, would require an enormous capital expenditure which would be prohibitive to any developer with or without support from TfL, Network rail and LBB..

The remoteness of the station is a security issue, particularly in the dark, for females, the elderly and infirm and children.

There is no viable public transport linked to the station. Three buses run during the weekday day times at intervals of approximately 2 hours.

TfL Connectivity for Travel classification in the central area of the proposed Broke Hill development has a connectivity score of 38%, putting in the bottom 40% of the population in England and Wales.

If the track is closed for emergency repair or due to an unforeseen incident, there is no alternative public transport to convey passengers to or from the Knockholt Station area.

The significant shortcomings of this station and its lack of connectivity to ongoing travel by public transport should be seriously scrutinised and considered in the decision making process as Knockholt Station is not inclusive to all members of the public.

If the application is assessed under current policy and framework, then the station has no special bearing on the decision making process. The inadequacy of this station and the services to and from it were amongst the reasons the Appeal against refusal of the previous application was dismissed.

If the application is assessed under emerging policy and framework, namely NPPF and SDS, cross-border joint decision making would be required. In our opinion, considering this development as a default "yes" around a well-connected station should depend on London Borough of Bromley and Sevenoaks District Council co-operating and jointly determining whether Broke Hill is a suitable site for development. Otherwise LBB could develop the weakly performing Green Belt land parcels within their own area, if the infrastructure is considered sustainable, without the need for cross-border co-operation, therefore preserving highly performing Green Belt in the neighbouring Administrative area.

The Appendices that follow contain the original reports of the surveys and investigations carried out to provide information for the document. They have been included for reference if required.

Appendix A

Knockholt Station Access, Safety and Security

Knockholt Station Layout, Access, Safety Risks and Personal Safety and Security

Knockholt Station Layout, Access and Safety Risks

1. It is acknowledged in the Broke Hill planning application (PA) that Knockholt Station needs updating/upgrading.
2. Current legislation relating to safety and access almost certainly requires upgrading of the station to be fully user-friendly for disabled people and those with limited mobility - which Knockholt Station currently fails to do in a major way. Yet these are some of the most likely people to need a railway station when travelling to/from the proposed retirement village.
3. The footbridge to Platform 2 (for trains towards Sevenoaks and onwards) is inaccessible for wheelchair users, buggies, small children and limited mobility passengers. Trains returning from London stop at Platform 2, thereby requiring passengers to use the footbridge back to Platform 1 in order to access the station exit (on to Sevenoaks Road and for Broke Hill).
4. There is no room to build an exit from platform 2 directly back on to Sevenoaks Road, due to the vertical chalk cliff which borders the platform.
5. Providing access to wheelchair and buggy users etc. would require disabled lifts to be built (as can be found at Orpington and Sevenoaks Stations). Besides the enormous cost there is very limited space for such an upgrade on either Platform 1 or 2. As with bridges over motorways, building over a "live" main railway line is always a major and costly undertaking.
6. The steps on the existing footbridge are very poorly spaced i.e. too shallow and even cause able-bodied passengers to stumble. The Building Regulations recommended dimensions for such exterior steps are a minimum of 150 mm high (the "RISE") and maximum of 170 mm high but are currently below the minimum at 140 mm. A typical house staircase steps are 185mm high. The horizontal depth (called the "GOING") should be between 280 and 425 mm and are currently 320 mm. There are additional safety rules if there is any lip or overhang to the steps. The position of handrails is also regulated.
7. The forecast increase in passenger numbers from the Fort Halstead and proposed Broke Hill development need to be very carefully verified to assess whether the current platforms are big enough to handle the increase safely. Currently various parts of the platform are only approximately 30.5 cm wide before the yellow safety line has to be crossed. This is potentially dangerous for any fit and able person, let alone those with limited mobility and those with young children and buggies etc. The frequent fast trains pass through the station at 90 mph and additionally create a strong vortex effect i.e. sucking everything towards the train - especially if another train is already on the other line (making it even more of a "tunnel").
5. Providing access to wheelchair and buggy users etc. would require disabled lifts to be



Personal Safety and Security at Knockholt Station

A resident had related an incident he had been involved in at the station where a man was threatening another person on the platform. The resident had to choose between helping or calling for assistance using the assistance point on the platform. He chose the latter and the rail staff responded that he would start up the CCTV. This caused the resident alarm, believing that no CCTV was recording the incident which raised several questions about the safety and security measures.

Southestern was contacted in January 2026 and, as part of a wider fact-finding mission, the matter was queried. The operator assured that CCTV runs and records 24/7, but not necessarily being monitored on-screen at any moment in time and the footage can be recalled for review.

The station is well-lit and the light overspill contributes to the lighting in the car park. There are assistance points on both platforms.

A visit to the station in January 2026 confirmed the presence of CCTV, assistance points and ramps for rail staff's use to assist passengers. The platforms were well lit, but the car park was less so and the service road out to Sevenoaks Road (see photos, right) was adequately lit. However, the whole curtilage of the station is not visible from the public highway and is intimidating for some travellers, especially female, infirm or those with mobility issues and children.



Appendix B

Knockholt Station as a Well-Connected Station and Linked
Public Transportation

A Study to Determine Whether Knockholt Station Qualifies as a Well-Connected TTWA Station for Presumption in Favour of Development at Broke Hill

In December 2025, the UK Government put forward proposals for Presumption in favour of sustainable development around some stations, including those in Green Belt areas. The aim of this document is to establish whether Knockholt Station falls into this category and, if so, whether there is argument to challenge Presumption in favour of development in the case of an application to develop land at Broke Hill.

1. National Planning Policy Framework (NPPF)

A draft of the revised NPPF was released on 15 December 2025. There follow a few extracts which deal specifically development near stations and possible impact on Green Belt.

Section 4 Achieving sustainable development

The objective of section 4, is to meet development needs through sustainable patterns of development, including by maximising the potential for growth on suitable land within settlements, enabling development which will support the rural economy, rural communities and the provision of infrastructure, and limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside.

National decision-making policies, item S3: Presumption in favour of sustainable development, states:

1. *Decisions on development proposals should apply a presumption in favour of sustainable development. This means:
 - a. Policy S4 in this Framework should be applied when considering development proposals within settlements;
 - b. Outside settlements, policy S5 should be applied; and
 - c. In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay.*

Knockholt Station does not fall within a settlement (see Appendix 1 for the definition of a settlement and illustration of Halstead, Knockholt, Badgers Mount and Pratts Bottom's settlement boundaries) . Therefore Policy S5 applies to development around stations for Knockholt Station, see below).

S5: Principle of development outside settlements

1. *Only certain forms of development should be approved outside settlements [see Appendix 2 for section S5 of the Draft NPPF, Dec 2025 Section 5 in its entirety]*

Items a-g precede the section below..

h. Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long- term comprehensive development in the same location;

Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the day time by four trains or trams per hour overall, or two trains or trams per hour in any one direction.

Items i-j follow the section above

Footnote, for development around stations within a settlement, there would be a presumption in favour of sustainable development around any station, without the requirement to be "well-connected" (source: Daily Mail interview with Housing Minister 17 Dec 2025)

Section 13 Protecting Green Belt

Item GB3: Altering existing Green Belt boundaries, states:

1. *Green Belt boundaries should be altered through the preparation and updating of local plans where:*
 - a. *This would enable the development of land around stations; or*
 - b. *Exceptional circumstances are fully evidenced and justified.*

The stipulations stated above are either / or, implying that the exceptional circumstances that currently protect Green Belt will no longer apply near stations. This is alarming in several ways, mainly that Green Belt status would be removed (by boundary movement) around Knockholt Station, that there would be no protection against high-density development (encouraged by the policy).

Item GB4: Defining Green Belt boundaries, it states:

1. *When defining Green Belt boundaries, whether as a result of altering or establishing Green Belts, local plans should:*
 - a. *Only include land which it is necessary to keep permanently open as Green Belt*

The above seems to contradict GB3:1 and one could argue that GB4:1 should take precedence over GB3:1. Item GB4 continues to identify other protections to retain Green Belt land which could also be used in representations to planning applications.

Summary

From the information gathered from the NPPF rev. Draft December 2025, it has been established that Knockholt Station is in Green Belt which may require its boundary to be moved to exclude the station area (by a radius of about 800m - 15 minutes walk). It is not within a settlement, so the station is required to be "well-connected".

2. Is Knockholt Station Well-Connected?

The following section is a collection of information from various sources to determine whether Knockholt Station would be suitable to apply presumption in favour of development.

There is no official public "station rating" in this context, but a specific set of criteria determines which stations qualify.

Well-Connected Station

Definition

A "well-connected railway station" is a planning and infrastructure term used to define stations with frequent and reliable rail services, making the surrounding area suitable for higher-density development.

Specific Criteria

In the context of recent UK government planning reforms (specifically the draft National Planning Policy Framework or NPPF), a station is classified as "well-connected" if it meets the following specific criteria:

- *Location: It must be within one of the top 60 most economically productive "Travel to Work Areas" (TTWA)* in England as calculated by Gross Value Added (GVA)*.*
- *Service Frequency: It must be served, in the normal weekday timetable, by a minimum of four trains or trams per hour overall, or two trains per hour in any one direction, throughout the daytime. This also includes stations that have a reasonable prospect of meeting these criteria due to planned upgrades.*
- *Connectivity: It should offer a high level of connectivity to employment and services, generally considered to be within an approximate 800m (10-15 minute) walking distance of the station.*

Schemes meeting these requirements, within a reasonable walking distance (around 800 metres or 15 minutes) of the station, may receive a fast-track approval for planning permission, encouraging higher-density housing development, even potentially on green belt land.

More generally, a well-connected station can also refer to one that:

- *Integrates with other transport modes (e.g., bus, tube, tram, cycling, walking networks) to provide new travel options for the community.*
- *Travel times to and from the TTWA are generally considered to be within 45-60 mins.*
- *Has strong links to a high number of jobs and opportunities, acting as a significant hub within the overall transport network.*
- *Is designed with sufficient capacity and good passenger flow to handle high volumes of people comfortably and safely.*

Purpose of the Definition

This definition is primarily used in urban planning to identify areas where new, often higher-density, housing developments should be fast-tracked. The goal is to:

- *Increase access to jobs, education, and city centres.*
- *Reduce reliance on private cars and promote sustainable travel.*
- *Maximise the efficiency of existing transport infrastructure.*

Developments around these hubs may receive a "default yes" in the planning process, even on some Green Belt land, to help the government achieve its housing targets.

**See Appendix 3 for an explanation of TTWA calculated by GVA.*

Knockholt Station meets the minimum requirements for a well-connected station as defined by the draft NPPF description. The station lies outside a settlement, the nearest settlement being Pratts Bottom, approximately 900m distant.

Broke Hill proposal puts much emphasis on the proximity of the station and bus stops. The only connected form of public transport is an inadequate bus service that does not match the frequency of the train service. The S3 bus service operates only in weekday day times with a mere 3 buses per day at approximately 2 hour intervals. The station is therefore not well connected to other forms of ongoing public transport.

With two trains per hour, the travel time from Knockholt to/from London stations is around 50 minutes assuming one can alight on to platform 2 southbound (Chelsfield 22-25 mins; Orpington 26-30 mins; Sevenoaks 33-36 mins). For infirm and disabled individuals and those who cannot negotiate the footbridge, it is necessary to travel two additional stops to access stations with lifts to transfer the individual over to a platform to then take a train back to / through Knockholt. Journeys extending to Sevenoaks and back and request for assistance need to be pre-booked online to avoid the additional charge to travel to Sevenoaks and for assistance to be present in an otherwise unmanned station. The travel time from London to Knockholt via Sevenoaks is between 1 hr 09 min and 1 hr 24 min, outside the reasonable maximum travel time for a well-connected station.

Summary

Knockholt Station lies within and has a direct line to the administrative area of London, the top placed TTWA by GVA rating in the UK, meets the minimum requirement to qualify as well-connected, lies in the immediate area (800m radius removal of Green Belt status) and has a travel time within 60 mins (for able-bodied passengers only, see above), it could be considered for presumption in favour of development. However, its credentials under general criteria for a well-connected station (see above) fall short in all areas.

3. Planning Considerations

Infrastructure and other public transport

In Section 2's description of a well-connected station, additional criteria are included that should be considered vital when determining the application, namely that the rail service should integrate with other transport modes (e.g., bus, tube, tram, cycling, walking networks) to provide new travel options for the community and is designed with sufficient capacity and good passenger flow to handle high volumes of people comfortably and safely. Knockholt Station does not meet these criteria.

With two trains per hour, the travel time from Knockholt to London stations is around 50 minutes (Chelsfield 22-25 mins; Orpington 26-30 mins; Sevenoaks 33-36 mins) . Travel time increases to up to 1 hr 28 mins for those requiring travel to alternative stations in order to access platforms in both directions. This puts Knockholt Station outside the general definition of a well connected station.

Whilst a station very close to a nearby development would make travelling/commuting by rail to London and Sevenoaks convenient (though time-consuming), consideration should be focused on residents' need for facilities and travel anywhere apart from these routes.

One would assume a well-connected station should also be well connected with ongoing other means of public transport, for example, a bus service that complements the train service. There is a thrice daily weekday bus service that passes the station/Broke Hill at 10:20, 12:06 and 14:44 hr northbound to Locksbottom; and at 9:35, 11:35 and 13:55 hr southbound to Sevenoaks which renders it of no use to commuters. The service is of little use to Halstead, Knockholt or Badgers Mount residents requiring transport to the nearest medical services, shops etc., the nearest of which are in London Borough of Bromley, due to the infrequency resulting in long waiting times for a return bus service. Furthermore, the bus service does not run at all at the weekend. The walk alone to the nearest bus service other than the one that passes the station would take longer than driving to, say, Orpington, the nearest town. Therefore a private car will more than likely be required to reach hospitals, GPs, dentists, schools, vets and shops, etc. Even travelling to nearby villages by public transport (e.g. Otford, Shoreham, Chevening, Chipstead, Sundridge, Brasted, Westerham, Cudham) is circuitous and would require changes so essentially impractical and would require a taxi or private car.

Station Accessibility Classification

Much is written elsewhere about the limitations, layout and construction of Knockholt Station.

Accessibility Ratings are assigned accessibility categories by Network Rail (A, B, or C) to indicate the level of step-free access available.

- *Category A: Step-free access to all platforms.*

Category B: Step-free access to platforms may be partial (one direction only). Knockholt is a category B3 station (see Appendix 4 for DfT Station accessibility classification system)

- *Category C: No step-free access to any platform.*

When determining a planning application for development near a category B station, operational needs, passenger experience, local demographic accessibility needs, sustainability and community integration should be considered.

The station is not step-free and many of the residents of the Retirement Village proposed for Broke Hill would be unable to use the southbound platform of the station. This would require online pre-booked additional travel southbound to Sevenoaks and back to alight at Knockholt, or north to Orpington and back to travel south.

Well-Connected Area?

A further investigation was made into the Connectivity of the Broke Hill area. DfT has recently published a broad analysis of the connectivity of the population across England and Wales. The result for each area is set against a percentile of the entire population. The centre of the proposed Broke Hill Development has a rating of 38%, which puts it in the bottom 40% of the connectivity of the population of England and Wales (See Appendix 5 for brief description of the methodology of Connectivity as analysed by DfT).

4. Arguments to Challenge Presumption in Favour of Development around Knockholt Station Related to Submission of an Application to Develop Land at Broke Hill

This document confirms that Knockholt Station meets the criteria to define it as a well-connected station within the Travel to Work Area in the top GVA rated city in the UK, London.

It therefore follows that a planning application for a site within 800 m (15 mins walking) may be a candidate for Presumption in Favour of Development.

Whilst there are other objections to development on Broke Hill, dealt with in the normal planning process, and within other documents produced by Halstead Parish Council in response to the probable amendments to the NPPF regarding developments around stations, the list below includes arguments associated with its potential default yes that have arisen from the contents of this document.

- Station accessibility, see Planning Considerations, above.
- Proposed development of Broke Hill using the station's "well-connected" credentials would have to be jointly assessed by both LBB and SDC, it being a cross-border proposed development. There is adequate undeveloped, weakly performing Green Belt within 800 m of the station within the same administrative area as the station that could be used for development without the need for cross-border spatial co-operation, if the infrastructure is considered sustainable.

- Travel for those with limited mobility are required to book their journey online for them to travel to alternative stations in order to access trains. The travel time therefore increases beyond the maximum considered for a well-connected station - over 60 mins.
- Whilst the station would be convenient for commuting / travel along the line between London and Tonbridge, there is very little other public transport available for leisure and commuting, necessitating private car transport for all other travel purposes - doctor, dentist, hospital, shops etc. The more general reference to a well-connected station (see Section 2, Specific Criteria, above) addresses the need for integration with other transport modes, which would have to be realistic. Walking / cycling would not be appropriate in this particular area for many elderly people nor those with limited mobility.

Appendices 1 - 5

Appendix 1

Definition of a settlement

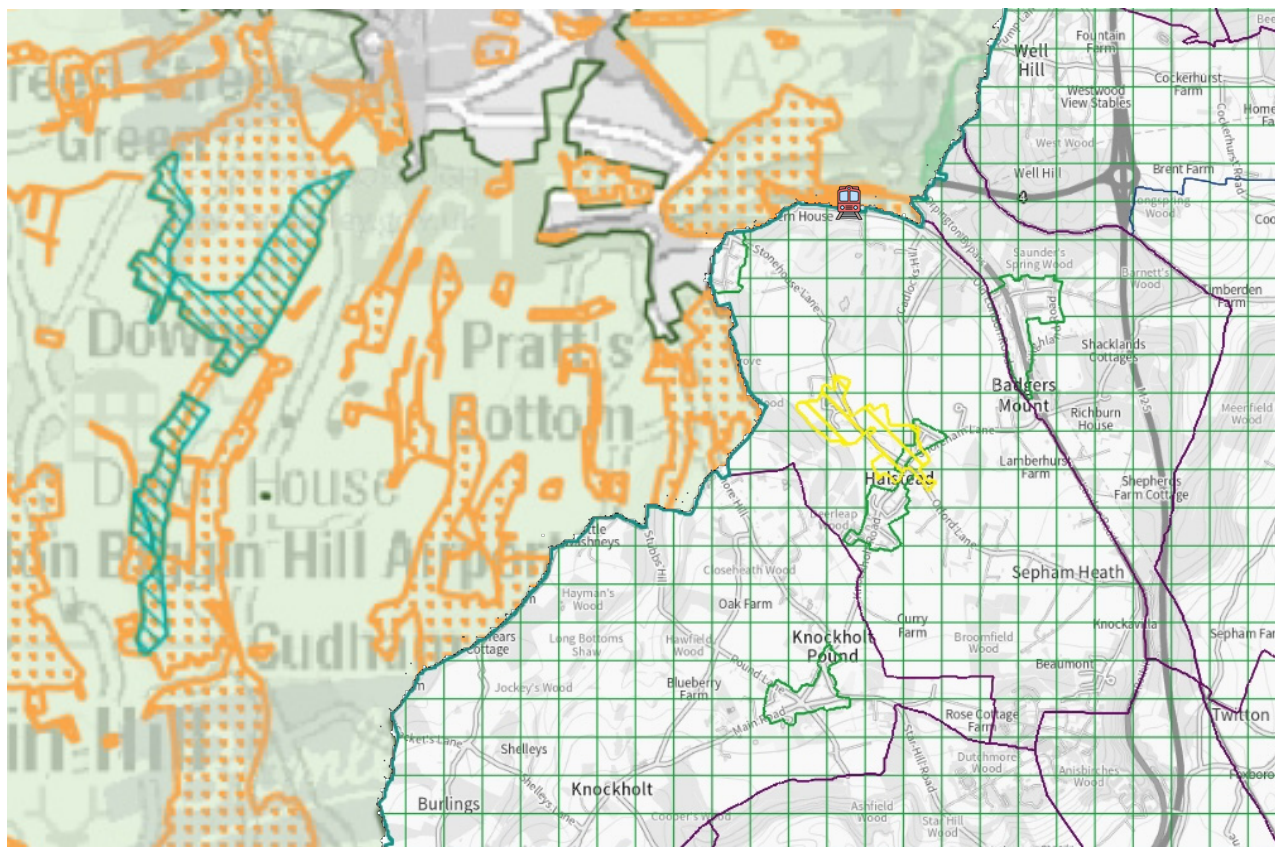
In UK planning, a settlement refers to a defined built-up area (like a town or village) within a settlement boundary, a line drawn on maps to distinguish urban areas from the open countryside, guiding development towards sustainable locations while protecting rural character and directing new housing (source: Northumberland County Council)

Edge of settlements with Green Belt boundaries

For settlements where a Green Belt boundary has been defined, the boundary usually marks the edge of the settlement where there is a break in development or a change in character to more loose-knit development (source: SDC Sevenoaks Draft Green Belt SPD 2022).

In the map below, Halstead, Knockholt, Badgers Mount and Pratts Bottom settlements are defined by Green Belt boundaries. The Pratts Bottom settlement extends into Sevenoaks District at Stonehouse Road. Green belt is indicated by green grid in Kent and green shading in London. The orange dotted areas are Sites of Importance for Nature Conservation (SINC) and the green striped areas are Sites of Importance for Nature Conservation (SSSI), the yellow areas are conservation areas (source: Sevenoaks District Council, London Borough of Bromley).

Knockholt Station is marked by a red train icon.



Appendix 2

NPPF extracts

The original draft report produced for Halstead Parish Council included extracts from the Draft NPPF December 2025.

For the purpose of this version of the report, the extracts are not included.

The information for this report mainly references Sections 1-4 and 13 of the Draft NPPF (December 2025).

A copy of the Draft NPPF document is available online.

Appendix 3

Gross Value Added (GVA)

Travel to work Areas (TTWA) that the NPPF is promoting for development are intended to facilitate commuting to major employment areas. Their practicability is rated by various criteria, known as Gross Value Added. GVA is an economic measure of the value of goods and services produced in an area, industry, or sector, representing its contribution to the overall economy, calculated as output minus intermediate consumption, and used to gauge regional economic performance and estimate GDP. It's a key indicator of economic health, showing how much value is generated by producers, and can be broken down by geography (like UK regions) or industry (source: Office for National Statistics)

There are models and tables online to demonstrate the ratings of GVAs. Of course London is rated Number 1. Knockholt Station is located in London so would be included as a TTWA. For clarity, a station serving a TTWA must lie within that GVA area. So Knockholt station could be used as a TTWA area for London as the station is in a London borough, but Dunton Green and Sevenoaks stations could not as they are not in London's administrative area.

For reference, across England, Scotland and Wales, there are two TTWA areas south-east of London that fall into the top 60 in the GVA table (as at 2020); they are Medway (25) and Tunbridge Wells (31). So, for example, stations in towns and villages within the Borough of Tunbridge Wells could be assessed for development as they would be categorised as TTWA.



Appendix 4

Station accessibility classification system

Every station is allocated by operators to one of three categories A-C and described in public facing information provided by the operator as follows:

Category A: "This station has step-free access to all platforms / the platform"

Category B: "This station has a degree of step-free access to the platform, which may be in both directions or in one direction only"

Category C: "This station does not have step-free access to any platform." Operators **must** apply the following definitions to determine which of these three categories a station will be allocated to:

Category A

The station has step-free access to and between all platforms, at all times trains are running, via level access, lifts or ramps (in accordance with new-build standards re gradient/length). Additional station entrances or walking routes not meeting the A criteria are permitted, providing the additional walking distance to avoid these is no more than 100m.

Orpington is a Category A Station

Category B

The station does not meet category A, but has step-free access to either all platforms or at least one platform.

Stations in category B can be further categorised according to the following definitions to describe the level of step-free access:

- **B1. "Step-free access to all platforms - may include long or steep ramps. Access between platforms may be via the street."**

This station does not meet the A criteria, but has step-free access (to all platforms) likely to be usable by many people with reduced mobility. Access may be via ramps, up to 1:10 gradient (any length). Short end-of-platform ramps may be up to 1:7. Access between platforms may be via the street, no more than 400m. Access via level crossings is permitted (if full barrier). Access routes may be via car parks, or short access roads without pavements, but otherwise routes via the street must include a pavement. Additional entrances / walking routes not meeting the A or B1 criteria are permitted, providing the additional walking distance to avoid these is no more than 400m.

Sevenoaks is a Category B1 Station

- **B2. "Some step-free access to all platforms"**

This station has step-free access to all platforms, but major barriers exist which are likely to restrict the ability of some people to use the station. Step-free routes do not meet the A or B1 criteria (e.g. long ramps steeper than 1:10, or the step-free route between platforms is greater than 400m). Any station with an ungated or half-barrier level crossing between platforms is in B2 or lower. Any station where step-free access is only available at certain times, or only to certain passengers, is in B2 or lower (e.g. because lifts are unavailable when the station is unstaffed) for example, if the step-free entrance opening times depend on staff presence at the station.

Chelsfield is a Category B2 Station

- **B3. "Some step-free access, may be in one direction only"**

This station has step-free access to fewer than the total number of platforms.

Knockholt and Dunton Green are Category B3 Stations

Category C

The station has no step-free access to any platform.

Appendix 5

Conectivity of the Broke Hill Area

In 2025, The Department for Transport introduced a Nationwide Connectivity metric to measure someone's ability to get where they want to go. It measures opportunity to travel to employment, services and for social reasons, weighted by people's overall proclivity to take those options. It aims to capture as the most common modes of travel and destination types, the time required to reach these destinations, the value presented by the destinations, and people's travel preferences.

A "score" is used as shorthand for Connectivity score, or the Connectivity for one or more modes. "Starting location" refers to a selected 100 sq m grid square.

The default Connectivity metric (the 'overall' score in the Connectivity Tool) measures Connectivity by:

- walking,
- cycling,
- public transport, including walking to and from public transport stops
- driving
- overall - which excludes driving, to represent sustainable modes of transportation. It is a weighted average, with weights determined by number of trips as reported in the National Travel Survey (NTS), and which are approximately 52% public transport, 40% walking, 8% cycling.

The purposes of travel considered are:

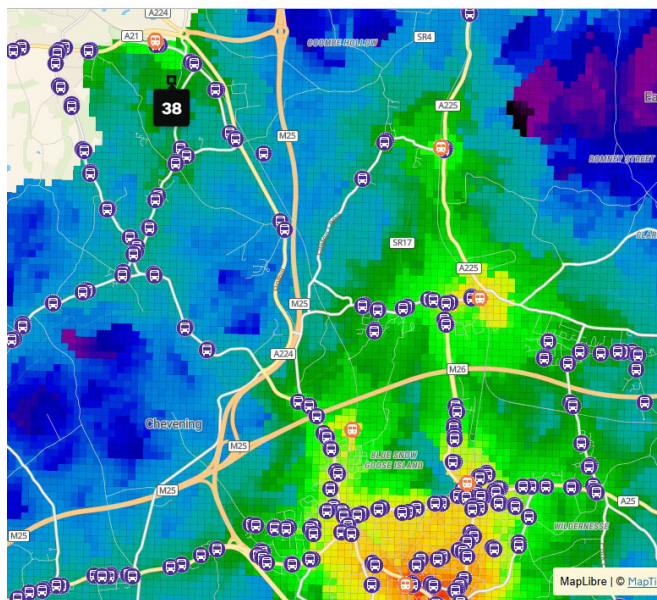
- employment,
- visiting friends in their homes (residential),
- education,
- shopping,
- leisure and community,
- healthcare.

Calculation of Connectivity Scores

Scores are aggregated from destination contributions, adjusted for trip time and destination value, then scaled relative to the highest score.

- Uses a log-sum function for jobs and residences, weighted sum for others.
- Overall score is a weighted average of mode-purpose scores, defaulting to travel proclivity weights.
- Scores are scaled from 0 to 100, with 100 representing the most connected location.
- Higher scores indicate better access to destinations within an hour.

The Overall Connectivity Score for the centre of the proposed Broke Hill development (excluding the Retirement Village and Nursing Home areas, whose residents are unlikely to use much of the travel services) is 38%. This means that it falls in the bottom 40% of travel connectivity in England and Wales. For comparison, Fort Halstead scores 18-26%, the Ryewood development in Dunton Green scores 61%.



Appendix C

Transport Assessment and Highways - Layout and Onward
Travel around the Station

Transport Assessment and Highways Layout and Facilities around Knockholt Station

Transport Assessment

Introduction

This report has been compiled after more than 100 surveys and observations by a nearby Halstead resident of 55 years, who has a lifetime of car, LGV and HGV experience. Residents and local politicians have been involved for over 2 years in efforts to improve safety at the A21/Sevenoaks Road fatal accident and other junctions relevant to the Broke Hill Planning Application - but a satisfactory outcome has not yet been achieved.

Road Naming Errors in the Planning Application ("PA"):

1. The PA is incorrectly and repeatedly addressed or identified by the applicant as being in London Road but 100% of the site road frontage and the postal address is Sevenoaks Road. The whole PA must be re-written by the applicant so that local residents and businesses are granted their legal right to know exactly what is being proposed and exactly where.
2. For the avoidance of doubt, Sevenoaks Road in this report is the section from the currently closed-off, right turn junction on the A21 into Sevenoaks Road, which then passes Knockholt Station. The same contiguous road then becomes London Road and further on changes yet again to Old London Road up to Badgers Mount Roundabout. The numerous pages of traffic movement surveys in the PA also pose a risk of being wrong where the applicant has incorrectly listed them as London Road instead of Sevenoaks Road or vice-versa.
3. Similarly, the applicant repeatedly and incorrectly refer to Badgers Mount Roundabout as Shacklands Roundabout and this also requires multiple corrections before any consideration is given to their PA.

Transport - Residual Impacts

1. The applicant should have submitted their Transport Plans to KCC before sending in their PA but have not done so - HPC also need to see this before finalising their position. However, paragraph 2.1.2 on page 3, Vol1 of the Transport Assessment says grounds **"The NPPF states that development should only be refused or prevented on transport grounds if "Residual Impacts Are Severe"**. Despite KCC Highways and National Highways apparently making no objection to a previous PA in 2019, this must be reviewed again based on the serious and fatal accidents since then, and now that PP has been given to a similarly large development at Fort Halstead (with all the associated extra traffic). NB: SDC and KCC will not normally consider two PA together but Fort Halstead now has that PP with work planned to start in a few weeks time (as at January 2026). Therefore, the high level of traffic planned from Fort Halstead must now be considered in the Broke Hill PA. There are also several smaller local developments which will further increase traffic flows and risks in the whole area.
2. The only roads which can be used to access or exit Broke Hill in Sevenoaks Road are:
 - Wheatsheaf Hill
 - The A21 but only from the Bromley bound carriageway
 - Old London Road from Badgers Mount Roundabout and the contiguous London Road (which is then contiguous with Sevenoaks Road).

Taking those same roads in turn:

- A. **Wheatsheaf Hill.** This is a hill with a change in elevation of approximately 20m in less than 200m i.e. a gradient of approximately 1-in-9 to 1-in-10. Buses are meant to be restricted to 1-in-12 hills maximum. It is also a narrow road with a very pronounced double "S" bend which severely restricts forward vision. Only approximately 70 m or 35% of the Hill is straight. There is an awkward obtuse angled approach from London Road (as shown on the applicant's drawing 22-029-

015). It is entirely unsuitable for buses, school coaches, and HGV's and is, therefore, an even more serious safety risk if it has to cope with significantly increased traffic flow from Broke Hill and Fort Halstead. "Unsuitable For HGV" signs are at the top and bottom of the road. A recent Road Survey for HPC recorded the minimum road width as only 4.9 m i.e. insufficient to allow buses or trucks to pass each other safely, particularly on the sharp bends. The maximum road width was recorded as 5.7 m with an average of 5.47 m - well below the current minimum requirement for newly built A roads of 6.75m to allow them to pass each other at all. Newly built A and B class roads must also be a minimum of 7.3m wide where HGV's and buses regularly have to pass each other at 30mph. The survey also identified the need to narrow and realign the "bell mouths" where it joins London Road and Hewitts Roundabout in order to slow traffic in readiness for Wheatsheaf Hill's narrow width and two blind corners - but bearing in mind the need simultaneously to keep a smooth, safe exit from Hewitts roundabout.

The narrowness and obtuse angled entry to the railway bridge from London Road mean that buses, wide vehicles, those with an overhang, "rigid" 8 Wheelers, those towing a trailer or articulated semi-trailer, need to cross the centre white line in order to negotiate the bends or enter the bridge "square -on". Heavy construction traffic would simply exacerbate the situation.

All of the above become much more serious in icy conditions and in the dark. There is no street lighting on Wheatsheaf Hill. Basically Wheatsheaf Hill is inadequate for the task now let alone as Fort Halstead is developed and if Broke Hill is given PP.. The railway bridge weight limit must also be reassessed for multiple HGV and bus use from Broke Hill and Fort Halstead, including during any construction period (expected to be several years).

- B. **The A21.** Transport for London (TfL) has recently issued their report which states they will not be re-opening the closed off, right turn junction on the A21 into Sevenoaks Road (where there have been 3 (the Met Police now agree it is 4) fatal accidents, not 2 as quoted by the applicant). It is also the police's preferred decision. This means that traffic bound for Broke Hill coming from London will have to carry on up to the dangerous and congested Hewitts Roundabout and either exit at Wheatsheaf Hill or go back down the Bromley bound carriageway of the A21 and turn left into Sevenoaks Road. However, this left turn is a dangerous hairpin bend with a very tight inclusive angle of 30 degrees and with the two further hazards of being on an adverse camber and a drop in levels. Cars, trucks and buses have to slow to walking pace to corner - resulting in vehicles bunching up behind on the A21 and consequent risk of rear end shunts.

The applicant has provided a plan, drawing number 41257/5501/031, to build a run-off lane from the A21 into Sevenoaks Road but it makes the problem worse. The run-off lane is required but the design proposed is seriously flawed and just makes the turning even more acute by moving left turning traffic closer to the kerb. Basically the A21 junction is not suitable as a main access route into Broke Hill unless the right turn into Sevenoaks Road is re-opened safely with traffic lights, a filter left lane of good design and average speed cameras etc.etc.

- C. **Old London Road/London Road.** Traffic bound for Broke Hill from any of the Hewitts Roundabout junctions could use Wheatsheaf Hill or the left turn off the A21 described above but with all the serious risks listed herein.

The only adequate access route to Broke Hill in terms of carriage width is the Old London Road and contiguous London Road from Badgers Mount but unless one is coming from the Sevenoaks direction it means an additional 2 to 2.5 mile journey. Drivers coming from all other directions will just not take this option and will use Wheatsheaf Hill with all the dangers detailed above. However, the substantive proposed footpath and cycle path will restrict this otherwise one (and only) partially suitable road for access to Broke Hill.

Pedestrians and Cyclists

The Broke Hill proposal overstates the requirement for these two groups, important as they are. Furthermore, many suggestions in the application are totally inappropriate for this general area and specifically around the three roads listed above. For example, to suggest pedestrians and cyclists should

even go near Wheatsheaf Hill and Hewitts Roundabout shows a lack of local knowledge or understanding of the dangers and how those locations actually work. No amount of path and cycle lane construction will sufficiently reduce the risk and if it did there would be even more unwelcome traffic delays and many frustrated drivers.

Hewitts Roundabout and the A21 junction with Sevenoaks Road are the most accident prone junctions by far to be found on crashmaps.co.uk. the applicant's PA confirms 70 collisions in the 5 years of the study area - that is an appalling accident record. Despite the overwhelming mass of detail in the applicant's PA they do not mention the dangerous fatal accident A21 junction at Stonehouse Lane. The gaps between the islands in the centre of the road and the kerbs are too narrow for a motorist to give the legally required "wide birth" to cyclists, resulting in the A21 traffic being forced to slow or totally halt. To force a main A road and motorway feeder road to a halt in this way is totally unacceptable and potentially dangerous, particularly to the cyclists.

Just as importantly, the enormous capital cost and ongoing maintenance costs of the applicants suggestions would be untenable. Neither TfL, LBB, SDC nor KCC have the funds to maintain the existing paths and cycleways properly and this is highly unlikely to change.

Hence the vast majority of local walkers and cyclists already avoid these areas knowing the risks.

Car Drivers

No matter how much the proposal focuses on moving away from car journeys it will be essential for any residents of Broke Hill to retain their cars for the foreseeable future. The bus service is minimal and always vulnerable to cost cutting, including recently. Neither can it replace journeys required by individuals or families for nursery or secondary school, baby sitters, carers, out of school activities, shopping and health appointments, vets visits etc. etc. or simply visiting friends.

Knockholt Rail Station

The station is opposite the site may be a lucky coincidence but is certainly no panacea. Access to Platform 2 for Sevenoaks trains and beyond is not possible for the young, the elderly or those with mobility problems - the steps are very poorly designed - being too shallow. Similarly, passengers returning from London have the same problem crossing back to Platform 1 from Platform 2 for the exit. Building a new passenger bridge over the railway lines with mandatory lifts for the disabled etc would be yet another major capital and maintenance cost and lack of platform space to build is a very serious restriction.

Two or more sections of 17 (or 34 or more - it is not clear) car parking spaces in Sevenoaks Road used by train commuters are proposed to be removed, and yet everyone is trying to promote public transport. It is proposed to move the bus stops further away from the station entrance, thereby making it more difficult to use the public transport for mobility restricted passengers.

Furthermore, the proposals also include moving one of the site entrances back to near where it was before the golf course was built. Thus re-introducing a dangerous staggered crossroads at the station entrance, where Broke Hill residents and commuters will be rushing to catch their trains. The existing main entrance to Broke Hill is better positioned and does not result in Broke Lodge, Station House or the multiple travellers' homes being exposed to so much noise and traffic movement (this is believed to be another reason for originally moving the golf club entrance to the current position).

CONCLUSION

- a. There are numerous "Severe Residual Impacts" listed above which give reason to refuse or prevent Planning Permission being given.
- b. Some of the causes of concern are not easily remedied without further major infrastructure changes e.g. a new road bridge over the railway at Wheatsheaf Hill; a new Knockholt Station passenger footbridge with lifts for the disabled; a much enlarged and straighter Wheatsheaf Hill roadway; re-opening the A21 junction with Sevenoaks Road for right turning vehicles (but safely with traffic lights and average speed cameras etc); major safety improvements to Hewitts Roundabout (e.g. traffic lights and a much simpler white line lane design); reducing the speed limit to 40mph on all local roads (to

make them consistent all the way from south London to the M25 Spur) and 50mph on the M25 Spur itself; average speed cameras to force speeds down to the legal limit and get drivers out of “motorway speed mode” as recommended by the Met Police etc. etc. NB: Speeding is the major problem on all these roads.

- c. Probably the biggest difficulty in overcoming the “Severe Residual Impacts” (to get PP) is the multitude of different views held by Councils or Authorities involved in the area, e.g. LBB, SDC, six Parish Councils or Wards, TfL, KCC and KCC Highways, National Highways, Metropolitan Police, Kent Police etc etc. For example the Met do not want the A21 junction with Sevenoaks Road reopened and TfL do not want speed cameras or to pay the estimated £3m for the traffic lights (even without the cameras).
- d. Therefore, if PP were granted by SDC or the Government then any Section 106 agreements, infrastructure or similar would have to be completed and paid for by the applicant before they were allowed “to lay the first brick”. Otherwise the multitude of authorities listed in point c. above would allow the applicant to exploit every weakness or loophole to their advantage. Even the police object to some of the speed limit reductions and, along with TfL, object to the introduction of speed cameras (but for different cost and enforcement reasons). All those listed above are under severe financial pressure and will strongly resist any expenditure - and the applicant is unlikely to pay the full cost of all the necessary works.
- e. In short, there is good reason and justification to oppose the Broke Hill Planning Application, for “Severe Residual Impacts” plus Transport and Access reasons, in addition to the major Green Belt or other objections.
- f. This Application must be re-issued, correctly addressed throughout, and with only those items that the applicant can control or directly influence listed. Furthermore, the statistics are incorrect in many places and all need rechecking e.g. the time it takes to walk to Sevenoaks town from Sevenoaks Station is 50% understated. All of the metric measurements should also be listed in the Imperial sizes. Only then can the local residents and businesses more fairly re-assess the real situation fully - with more time being granted by SDC.

Highways - Layout and Onward Travel Facilities Surrounding Knockholt Station

Layout

1. The Broke Hill application proposes to remove 17 (or possibly double that number - to be verified) car parking spaces from Sevenoaks Road. This is totally counter-productive and goes against the applicant's own stated "vision-led" objective of getting more people to use sustainable public transport.
2. The applicant claims that future Broke Hill residents will not need to use their cars. However, the site is big enough to "encourage" residents to use them, or get a lift to reach the station. Similarly, the car is sure to be used if it is raining - or because a child will otherwise be late for school.
3. The access to Broke Hill from Knockholt Station involves a climb to reach most of the site. From the station to the middle of the site involves a minimum change in elevation of 25m and up to 35m, with a 13% rise over a horizontal distance of 150m to reach the development from the road.
4. The proposal to relocate the bus stops further from the Station entrance does not consider the disabled or limited mobility passengers. Furthermore, without the current bus stop lay-by, Sevenoaks Road will be unnecessarily obstructed for cyclists and vehicles.
5. The proposals for a significant increase in cycle lanes and footways (and their ultra-high specification) are not all necessary and would be unsustainable in regular maintenance terms - as proven by the current poor level of such maintenance. Importantly the proposals significantly restrict the current benefits of the contiguous Sevenoaks Road/London Road/Old London Road - i.e. the only road able to service Knockholt Station directly and safely (it was formerly the main A21 before the M25 was built and so it is a relatively wide, generally safe road and already limited to 40mph).
6. Without absolute guarantees (and S106 agreements), the bus service regularity will never be sufficient and Knockholt Station will be affected accordingly.
7. Network Rail's planning requirements need to be studied for the station itself and for any changes or weight limitations to the railway bridge at the bottom of Wheatsheaf Hill (for Broke Hill traffic and the additional Fort Halstead traffic. Additionally it should be checked if the station complies with the safety and security requirements of the BTP Standards.

Other general items which may affect Knockholt Station directly or indirectly

- A. The dangers with Wheatsheaf Hill as a "Sustainable Access" road for the station.
- B. The dangers with the junction of the A21 and Sevenoaks Road (currently closed off) as a "Sustainable Access Road" for the station
- C. The "tunnel-like" footpath and cycle path from the small close of seven houses in Sevenoaks Road towards Pratts Bottom - un-nerving for the young and female individuals in particular walking to or from the station - (especially at night) and a major deterrent to Halstead and Pratts Bottom residents to use the station.
- D. The currently closed-off junction of the A21 and Sevenoaks Road restricts and deters potential train commuters such as local cyclists, motor cyclists, electric scooters and cars etc. from using the station. TfL is involved but re-opening the junction safely would be essential to access any development granted at Broke Hill. TfL is holding back from re-opening the junction in expectation of the applicant being obliged to make a major contribution to the cost, probably by a S106 agreement. TfL quotes £3m to just install traffic lights but with no speed cameras or other traffic safety measures such as a better left turn run-off from the A21 into Sevenoaks Road to access the Station
- E. There is a serious problem with the islands in the middle of the A21 - they do not allow a cyclist to pass at the same time as a vehicle - thereby restricting the safe use of the road to access Knockholt Station. TfL involved..
- F. Update /expand the list of local Brown Field Sites or potential Grey Belt sites to present to Government, KCC, SDC etc to take the pressure off genuine Green Belt sites such as the highly performing Broke Hill.
- G. KCC, SDC or HPC to compulsory purchase as many brown field sites in the area that could be developed - in order to also take the pressure off Green and Grey Belt development?