

1. Introduction

- 1.1. This plan is not sound, not positively prepared, not justified or effective.
- 1.2. The plan is printed with page numbers but no individual references which makes it difficult to track individual items as the plan is updated. There are approx. 280 entries of which about 1/2 have a costing.
- 1.3. A major development of 17,460 houses needs essential services to be prioritised. Water, Electricity, transport, connectivity, medical services. The plan lacks detail and does not cover the essentials of life which existing residents are already concerned about.

The following comments will be dealt with in page order:

2. SDC Policy IN1

"All new development must be supported by appropriate on & off-site infrastructure and services as identified in the IDP or as advised by the relevant infrastructure provider(s)."

The IDP covers the following topics:

2.1. Education:

2.1.1. **Primary School Provision** (p.1): Dunton Green P. Sch. Is to be expanded to 2FE and a new school is to be built at (p.2) Fort Halstead. HPC have consistently argued, based on local evidence, that all local Primary Schools are under-subscribed and this fact linked with parental choice and use of private cars in a rural area means new schools are not justified.

2.1.2. **Special Needs & SEND Provision:** Halstead Community Primary School has a SEND provision and plenty of places available for both mainstream and SEND..

2.2. **Health & Social Care:** There is very little provision in the IDP. Currently most families in Halstead, Knockholt, and Badgers Mount go to GP surgeries in Chelsfield and to the PRUH and other hospitals in the London Borough of Bromley. SE London Healthy Urban Development Unit wrote on 11/11/2025: *"While the planning application lies within Sevenoaks District Council, the site is located on the border with the London Borough of Bromley. Given the current provision of health infrastructure, it is anticipated that the development will disproportionately and overwhelmingly impact health services located within the London Borough of Bromley"* (see Appendix 1: Healthcare & Medical). There is no Statement of Common Ground between Sevenoaks District Council and the London Borough of Bromley.

NHS Kent & Medway letter 11/11/2025: *"The proposed development site lies within Sevenoaks District Council and therefore the KM ICB area, the site is however located on the border with the London Borough of Bromley. KM ICB has discussed with South East London ICB (SEL ICB) and agree that given the current provision of health*

infrastructure, it is anticipated that the development will disproportionately and overwhelmingly impact health services located within the London Borough of Bromley.” (See Appendix 1: Medical)

2.3. Transport:

2.3.1. **Highways** (p.8): The A21/Hewitts Roundabout junction is expected to be funded by the ST5-1, developer. Improvement to this area which is the link road from junction 4 of the M25 and the scene of multiple crashes and illegal race meetings is essential especially as the Fort Halstead development, only 1 mile south has already commenced. There is no costing, no evidence of agreements between Highways, Transport for London. The Statement of Common Ground is undated and unsigned.

2.3.2. **Rail** (p.10): Knockholt Station is not in Knockholt (the village is over 1 mile away) it is in the London Borough of Bromley, Chelsfield Ward. There is no evidence of an agreement between TfL, National Rail, London Borough of Bromley or KCC that this upgrade to a Lift and other features will happen. A Statement of Common Ground is only between Sevenoaks District Council and Network Rail; the London Borough of Bromley should be included.

2.3.3. **Bus** (p.11): no evidence that the very poor bus service currently serving Halstead, Knockholt and Badgers Mount will be improved. In addition, there are already 635 houses under construction at Fort Halstead and a potential 810 at ST5-1 if planning is given.

2.3.4. **Active Travel** (p.13): no development of active travel routes in spite of Fort Halstead already underway and potential of ST5-1

2.4. Utilities

2.4.1. Water Supply (p.21): (see Appendix 2)

2.4.2. Wastewater (p.25): (see Appendix 2)

2.4.3. Gas (p.31)

2.4.4. Electricity (p.32)

2.4.5. Digital Connectivity (p.32): no improvements suggested in spite of potential development of ST5-1 and current development of Fort Halstead. The Government Lite Connectivity Tool places various areas of Halstead in the lower brackets of connectivity. Urgent support is needed. SoCG between SDC & KCC places responsibility on to digital providers. SoCG unsigned & undated.

2.5. **Sports & leisure** (pp.32-45): improvements to the netball court at Halstead Recreation Ground funded by all major developments, essential, long-term i.e. 2037 – 2042! HPC have already upgraded the netball court but now the netball club has disbanded. Football & Cricket would benefit from upgrades.

2.6. **Community & Cultural Infrastructure** (p.48)

2.7. **Emergency Services** (p.49)

2.8. **Green & Blue Infrastructure** (pp.49-53)

2.8.1. Facilities for children & young people at Halstead Recreation Ground – desirable but unfunded and no contact has been made with HPC.

- 2.8.2. Watercroft Woods, Halstead (p.56): this was itemized in the Open Space Study 2018 and stated that permission for a Cemetery had been given. It is now listed in 2026 to be funded by all developments, desirable, commencing from January 2027. This area is now an active and busy cemetery & crematorium.
- 2.8.3. Cadlock Hills (p.56): no such space exists
- 2.8.4. Deerleap Woods (p.56): this site is actually in Knockholt not Halstead. It is currently under SDC Planning Enforcement for illegal soil & waste dumping.

3. Conclusion:

- 3.1. There are about 280 entries in the IDP of which only half have any indication of costs. Development of the scale proposed needs much more detail in costings, timing and priority levels.
- 3.2. The IDP is poorly researched – Halstead children’s Play Area to be in a Cemetery.
- 3.3. Statement of Common Ground: 18 reports, of which only 3 are signed and dated which suggests the other 15 will not be implemented.
- 3.4. The IDP is not effective, at least not in the northern area of Sevenoaks District.
- 3.5. ST5-1 plus other proposed development areas, total 1,760 houses, are already classed as ‘red clusters’ i.e. very little chance of a modal shift to walking cycling etc.

4. Appendices:

- 4.1. Appendix 1: Healthcare & Medical
- 4.2. Appendix 2: Water Infrastructure of Halstead Parish