



# WEST MALLING PARISH COUNCIL

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16<sup>th</sup> July 2018

## **WEST MALLING PARISH COUNCIL**

### **RESPONSE TO THE REG 19 DRAFT OF THE TONBRIDGE & MALLING LOCAL PLAN**

16<sup>th</sup> July 2018

West Malling Parish Council welcomes the efforts of the Borough Council to make the Government's requirement for 6,600 extra houses more bearable. However, we point out that the Tonbridge part of the Borough, which represents one third of Tonbridge & Malling's population, is set to have an additional 1,042 houses in the period to 2031, only 15% of the total. We believe that this imbalance should be addressed. The Tonbridge area should not be insulated from housing need merely because Borough Green has been included in the same housing market area.

West Malling Parish believes there are four pressing Community Needs with which we would like the assistance of the Council in incorporating supportive policies within the Local Plan:

- 1 The need to protect the historic town of West Malling by extending the Green Belt around it.
- 2 A chronic shortfall of car parking places for workers in the town.
- 3 The urgent need to establish a firm future for a GP surgery in West Malling preferably in a town centre location.
- 4 Lack of housing available for rent at an affordable price particularly for young people who have a long association with our town.

We have dealt with the Local Plan development site proposals in relation to each of these needs below.

#### **Green Belt extension**

This is one of the two biggest issues in West Malling. The Parish Council has supported the extension of the Green Belt for many years, including at the last Review of the Local Plan.

We are therefore delighted to welcome the Borough Council's proposal to extend the Green Belt generally to London Road and Watlingbury Road. We believe that this boundary will:

- a) provide a strong line in the landscape to form a defensible edge of the Green Belt
- b) provide a green lung to surrounding communities
- c) help to prevent West and East Malling merging with Kings Hill, Leybourne and Larkfield
- d) protect the historic town of West Malling.

During the Reg 18 consultation, the Parish Council supported the line being drawn along Kiln Barn Lane further east to protect East Malling Research Station and woodlands and countryside to the east of Watlingbury Road.

However, we recognise that the proposed extension is the major part of the request we made, and we support it being carried forward into the Final Draft Local Plan for the Inspector.

The Malling area is on the very edge of the Green Belt and has provided major building sites in Peters Village, Holborough, Leybourne Park, Leybourne Chase, and Kings Hill. Larkfield in particular is now largely built over.

An analysis of the questionnaire responses from the open public meeting held on July 1<sup>st</sup> 2018, shows public support for the extension from West Malling residents. 212 (93.4%) respondents supported the proposed extension of the Green Belt to London Road and Wateringbury Road compared to 15 (6.6%) who opposed it.

**We urge the Borough Council to resist calls to reduce the extension of the Green Belt and to retain the proposal as included within the Draft Plan.**

### **Brickfields to Town Hill site**

This site, which is in the Green Belt, has been designated for 110 homes. It did not appear in the Borough Council's previous Local Plan Draft.

However, the Parish Council has put forward a strong plea for part of this site to be used as a car park dedicated to the use of workers in the town. Our town has thrived against the odds when many others have gone to the wall. The challenges of free parking at nearby urban shopping centres and supermarkets, added to the proximity of Bluewater and the attraction of online shopping, present huge challenges to our High Street of independent shops of which we retain many.

We have over 130 businesses in the town and research commissioned by the Parish Council, a copy of which has been supplied to the Borough Council, demonstrated that there was a need for at least another 160 spaces to satisfy the total demand for parking for workers. Such a provision would relieve the current widespread pressure on residential and other community facilities such as the school. Workers' cars are preventing residents, their guests, tradesmen, social workers and parents from parking. Our investigation demonstrated that the Brickfields site was the best site in the town which could provide this facility.

The Council Planning Officers asked the Parish Council to provide evidence of the need for this workers' car park to justify the Borough Council putting a policy into the Local Plan which could provide the basis for a condition in any later Planning Consent to enable the delivery of the car park.

We have so far this year provided a copy of the research report, a letter of support from the Chamber of Commerce and to date 38 completed business questionnaires from retail and business concerns. All of these evidence the need for a business car park and support the creation of the facility. We have also supplied to the Borough Council a letter from a developer who is willing, subject to land price, to operate a wholly commercial car park on this site with only up to five houses supporting the construction costs.

The Parish Council's questionnaire following the July 1<sup>st</sup> 2018 meeting produced the result that 125 (59.8%) people oppose the development of this site for the construction of 110 houses compared to 84 (40.2%) who supported it. However, 165 residents (82%) supported the creation of a car park for workers to relieve the pressure on residential and community parking spaces in the town, in comparison with only 35 (17.5%) who opposed it.

West Malling Parish Council therefore believes that the community is willing to support the development of this Green Belt site only if it includes the creation of amenities for which there is a special and pressing local need. The Parish Council would support a mixed use development on this site, including an element of affordable housing, a business car park and a potential alternative site for a GP surgery (see below).

**Accordingly we ask the Borough Council in the strongest possible terms to support the continued vitality of West Malling as a rural market town, by inserting an appropriate policy into the Local Plan for the development of the site.**

## **GP Surgery**

TMBC officers have held discussions with the CCG on the future of the West Malling Doctors Practice. The practice has said that they do not intend to change the catchment area and that West Malling is centrally placed within that catchment area. The surgery is up for sale but no sale has been concluded. The practice has expressed a preference to remain open in West Malling High Street. The practice intends to lease back the premises after sale pending relocation, but have advised us that none of the prospective purchasers is willing to allow them to stay on site in the long term. The practice patient list will clearly grow from its current 20,000 by 2031 since Leybourne Chase, Kings Hill North, East Malling New Road, Brickfields and Offham Road are all within its catchment area. This underlines the need for modern surgery facilities preferably in purpose built premises.

There is no clear view yet on the position with regard to the preferred option of the practice, in the short or long term, or funding available from the CCG. The Parish Council finds this situation extremely perplexing since it would seem that the opportunity to benefit from developer contributions may be being missed.

A High Street location is favoured by the majority of residents - 204 (96.2%) votes compared to 8 (3.8%) who took a view that other sites would be acceptable. However, 79 (61.2%) residents were happy to support the Brickfields site as a potential alternative location for the surgery compared to 50 (38.8%) who were not.

**WMPC wants to see a modern surgery for West Malling and urges the Borough Council to use its best efforts to insert a policy into the Local Plan to enable that to happen.**

## **Offham Road, Manor Farm**

This site (currently in the Green Belt) was the most controversial for the West Malling Community. It was proposed for an 80 house development in the Reg 18 consultation draft. Many residents and the Parish Council opposed this suggestion on the grounds primarily of Green Belt status and of traffic generation onto Offham Road, which we felt was not able to take the additional traffic.

The Parish Council suggested to residents at that time, that an alternative option might be to develop the road frontage only for a small development of around 12 houses. The Parish Council has long wanted to see a small development of affordable houses, outside the right to buy, for people with a need to work in the local area, or with long association with the area, but who are unable to afford the high housing prices in West Malling. We completed the first round of consultation with Action with Communities in Rural Kent (ACRK), and this confirmed majority support for the project and identified a need for around 10 to 12 homes.

We are therefore pleased to see the reduction from 80 to 12 homes along the frontage as the Parish Council suggested. At the July 1<sup>st</sup> public meeting with residents, the Parish Council once more suggested that these houses might be considered for a local rural exception site development with ACRK, as planned by the Parish Council to deliver some affordable housing to meet the exceptional community need to justify release of land from the Green Belt.

This proposal to build 12 houses was supported by 130 residents (58.6%) and opposed by 92 (41.4%). The proposal to bid for these houses to be affordable housing of the type described above was supported by 145 residents (69%), and opposed by 65 (31%).

**West Malling Parish Council's position is therefore that we are prepared to support the proposal for 12 homes, provided the site is used to meet the exceptional need for low cost affordable homes for rent, outside the right to buy, for people with a long connection with West Malling as described above. We would want to see a policy within the Local Plan to support such a development. If this is not accepted, then we see no reason to lose the pleasant Green Belt rural edge to the town for such a small number of houses on the open market.**

## **Further house building proposals**

### **Kings Hill**

**West Malling Parish Council opposes this expansion of Kings Hill northward by approximately 1,000 houses.**

We believe that:

- a) development will harm the formally designated Quiet Lanes network which recognises the peaceful countryside feel to the area,
- b) the proposed access route from "Kings Hill North" to the bypass at West Malling Station will run through the undeveloped part of Broadwater Farm, not only damaging the Conservation Area of New Barns and Broadwater, and detracting from the landscape, but clearly providing an easy access to develop the remainder of the site in future years.
- c) the proposed northern boundary of KHN, following the ridge line of Pikey Lane, will be a very intrusive hard edge to the development since it will be highly visible from the bypass and surrounding countryside.

However if the Borough Council is minded to approve it, we would prefer to see the boundary drawn further to the south by:

- a) incorporating Hoath Wood within the development (74 votes in favour)
- b) providing a landscape barrier to the north of the development to screen and separate it from the Conservation area of Broadwater and New Barns
- c) locating the playing fields of the schools on the northern boundary again to provide a softer transition into the countryside and to protect the setting of the Conservation Areas. (153 residents indicated they would favour this approach).

Additionally:

- d) there should be no vehicular access onto the rural lanes north of the housing area, and we believe the vitality of the retail area of Kings Hill will improve if the newly developed area is connected to it.
- e) as we have yet to see plans for the design of junction 4 and the A229/A20 junction, it is not possible for us to gauge their effect on the landscape or whether they will be able to absorb this amount of additional traffic.
- f) we are aware that Highways England has expressed concern about the capacity of junction 4 M20, and indeed the motorway itself and we shall be interested to receive their views.
- g) the A20 suffers daily hold ups and the Amey investigation into the capacity of junctions between Leybourne and Coldharbour demonstrated that the majority are at or above capacity already. Again, we will want to comment on the proposed designs to accommodate this additional development.

The public consultation responses demonstrate that the majority of residents agree with us on these points 183 (83.6%) West Malling respondents oppose this extension of 1,000 houses, compared to 36 (16.4%) who supported it.

Those who opposed it said that:

- a) Kings Hill was promoted on the basis that it would be limited by the boundaries of the airfield, and such undertakings should be honoured, particularly when ownership was in the hands of the County Council.
- b) the extension harms the Conservation Area of New Barns and Broadwater ,
- c) the development harms the landscape of the area, being productive open fields with broad sweeping views to the North Downs and the Greensand ridge above Waterringbury.
- d) local roads are not capable of absorbing extra traffic, the A228, A20 and M20 (before the current works) being subject to congestion delays on a daily basis
- e) the access road as shown has a particularly damaging effect on the landscape, cutting across open fields, unrelated to current field patterns.

### **Forty Acres between Winterfield Lane, Lucks Hill and the bypass**

This does not appear in the Plan and this is welcomed. WMPC objects to the proposal on Green Belt land (as proposed in the emerging Local Plan), traffic grounds and lack of need to fulfil the housing requirement. 108 (83%) West Malling residents opposed this in comparison with 22 (17%) who supported it.

### **Gladman development to rear of former Startled Saint pub.**

The Parish Council opposes this development on Green Belt (emerging Local Plan) and traffic grounds, as the development is proposed to be accessed onto Kings Hill which is a very fast stretch of road at present. 112 (81%) residents opposed this in the questionnaire in comparison with 26 (19%) who supported it.

### **Lavenders Road**

We understand that an outline application for up to 90 homes is to be submitted for "land east of Lavenders Road". WMPC opposes development on this land because it would damage the rural setting, character and approach to the town including Lavenders Road - a designated Quiet Lane; is on land designated as Green Belt in the emerging Local Plan; is unnecessary to meet housing need; and the proposed access onto Swan Street would cause congestion and create a traffic hazard. The development is unsuited due to the proximity of the 11 century Malling Abbey which is home to the silent order of Benedictine nuns, is a place of religious retreat, the home of St. Augustine's theological college and the Pilsdon Community which provides home to a group of vulnerable members of society.

### **NIAB/East Malling Research Station**

The Plan removes for the time being at least a large area initially put forward for development between New Road and Kiln Barn Lane, Ditton. Officers seem to have accepted that the Research Station requires funds to keep operating, and so sites for 421 houses have been included. 205 houses are planned for New Road between the King and Queen and Bradbourne House, and a bigger site adjoining Larkfield Banks, apparently with access out onto New Road.

The issues here are:

- a) increased traffic through East Malling village
- b) the capacity of the New Road/A20 junction
- c) the effect on the setting of Bradbourne House, a Grade 1 Listed building of national importance and the surrounding historic landscape with its lake and Memorial gates, 30 acres of which are covenanted to the National Trust
- d) the course of the East Malling and Ditton stream which lies beneath the site flooding and breaching the New Road wall on occasion. The Environment Agency views on this issue should be obtained.

115 (80%) West Malling residents oppose the building of 205 houses on New Road compared to 28 who did not (20%).

The rest of the whole of the EMRS and associated landholdings, from Kiln Barn Road to Hermitage Lane, have been placed into an Area of Opportunity (AOO) which means consideration for development will be given in the next Local Plan revision in perhaps five years' time.

WMPC notes that Bushey Wood, an area to the south west of Eccles village was an AOO in the existing plan, and in this revision part of the site is now designated for 900 houses.

The Parish Council would oppose the loss of any more land from East Malling Research which is a valued local employer, and the East Malling road network is in our view not able to take the additional pressure of more house building.

### **Martin Square.**

9 homes are proposed on or adjacent to the KCC Larkfield Library site. There is concern as to how that will be achieved without loss of the library and mature trees which TMBC planted as mature specimens to line the square. WMPC would not resist a development proposal which replaced the library within a limited higher rise building, perhaps incorporating the public toilets at the same time.

### **North Pole Road**

A small development area is proposed on this road, and it needs to be clear that the road will not be opened up to allow access from Kings Hill feeding traffic onto a dangerous junction and into the congested village centres of villages of East Malling and Wateringbury.

## **Other Issues**

### **Viability of West Malling**

We remind the Borough Council of our earlier request that the development of West Malling town should be supported by policies which:

- a) protect the greatest possible variety of types of retail development, including our Farmers' Market and High Street events
- b) encourage the development of rear access to retail shops from the High Street car park
- c) preserve and enhance the many alleyways which open from the High Street in order to retain a distinctive feature of the town, encourage micro-retail premises, and protect rapid access routes in emergency situations

**Open Spaces, Infrastructure and Viability** studies which will form part of the Plan are still awaited. The list of Open Spaces has still to be incorporated in the Appendices and when this occurs the Parish Council may submit its own list of Important Green Spaces.

### **A20 traffic**

The congestion of the A20 is a matter of great concern to the Parish Council. The County Council is still preparing studies which will propose junction designs to absorb the traffic, and the Parish Council would like the opportunity to comment on those when they are published.

### **Aylesford Newsprint**

With the withdrawal of the application for mixed commercial and residential use, this site continues as an employment site in the Plan, with access from Leybourne Way/ New Hythe Lane. AN went into liquidation, and the Receiver may make a new application perhaps on industrial/commercial land only, or could rely on the current planning status and sell off land for existing uses.

This may mean that the opportunity for opening Bellingham Way, the private estate road through the site, as an alternative to the A20 has been lost, and all traffic will have to use Leybourne Way as now. There is also the issue of greater traffic impact from modern commercial developments compared to the highly automated Aylesford paper mills.