



WEST MALLING PARISH COUNCIL

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WEST MALLING PARISH COUNCIL

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

SUMMARY OF WEST MALLING PARISH COUNCIL RESPONSES TO THE LOCAL PLAN

West Malling Parish Council accepts that the Local Plan meets the obligation to provide for the additional 6,800 houses required by Government by 2031. However, we point out that once again the majority of new housing is proposed in the north and east of the Borough. South of Hadlow, in the Tonbridge market area, which represents about one third of Tonbridge & Malling's population, the Plan proposes only additional 1,114 houses in the period to 2031, only 16% of the total. We believe that this imbalance should be addressed to avoid the consequence that the Malling area, comprising mainly historic rural villages, will become a continuous urban suburb of Maidstone. The Tonbridge area should not be insulated from meeting housing need merely because Borough Green has been included in the same housing market area.

The Local Plan states at para 4.5.1 that TMBC'S major objective will be providing for sustainable development in the Borough, and that key to this will be "maintaining and enhancing the role of the Borough's existing centres". This needs to be reflected in specific support through the Local Plan to enhance the vitality and viability of these centres, not just in Tonbridge or in new development sites. West Malling will not survive as a Rural Service Centre unless additional parking and community needs are met; it simply will not be able to provide retail and service functions to the new households for which the Local Plan provides, and which we need to keep our shops and services viable.

The Parish Council believes there are 4 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 redefining and extending the Green Belt around it.
- 2 The need to maintain the town as a local centre for retail, services and employment by providing car parking for workers.
- 3 The need to address the lack of housing available for rent at an affordable price in West Malling particularly for young people who have a long association with our town.
4. The need to establish a firm future for a GP surgery in West Malling, preferably in a town centre location.

This report is a summation of the views of West Malling Parish Council. They are the result of three public meetings, and residents' surveys to which we refer in the text. We have not submitted individual survey response forms but we are authorised to make these available to the Inspector if required. Detailed responses to specific sites and policies on the Local Plan have also been submitted.

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 two Local Plans in 1994 and 2006. We are therefore delighted to support

the Borough Council's proposal to extend the Green Belt generally to London Road and Wateringbury Road. We believe that this boundary will:

- a) provide a strong line in the landscape to form a defensible edge of the Green Belt in the long term,
- b) provide a green lung to surrounding communities, and defend the Quiet Lanes Network,
- c) help to prevent West Malling from merging with Kings Hill, East Malling, Leybourne and Larkfield, and
- d) protect the historic town of West Malling and its rural setting in typical Kentish countryside.

Questionnaire responses from the open public meeting held on July 1st 2018, show public support for the extension from West Malling residents. 202 (93%) respondents supported the proposed extension of the compared to 15 (7%) who opposed it. Over 400 residents of West and East Malling signed a petition to TMBC in support of extending the Green Belt to cover all land between West and East Malling.

We therefore ask the Inspector to endorse the extended Green Belt on boundaries as set out in the Plan.

Brickfields to Town Hill site; rear of London Road. Site B on the map at p7.

This site, which is in the Metropolitan Green Belt, did not appear in the Borough Council's 2016 draft proposals map in "The Way Forward."

The Parish Council put forward a strong plea for part of this site to be used as a car park primarily for use of workers in the town. We accepted that housing would be necessary to enable a car park to be provided. Instead, the Borough Council included the site, but for 110 homes only. WMPC does not believe the provision of private homes alone constitutes the "exceptional circumstances" required to release Green Belt land.

We do believe that providing for the car park needed to keep our town alive would constitute such "exceptional circumstances".

West Malling has thrived against the odds when many others have gone to the wall. Many shops are independent specialist businesses, maintaining listed premises reflecting their traditional use over centuries. The challenges of free parking at 5 nearby supermarkets, added to the proximity of Bluewater and the attraction of online shopping, present huge challenges to High Street businesses.

Independent research commissioned by the Parish Council, a copy of which has been supplied for the Inspector, shows that there are over 140 businesses in the town employing over 1200 people, 86% of whom come to work by car. The study demonstrates that there was a need for a minimum of another 160 spaces to satisfy the total demand for parking for workers. Charged car parking introduced a few years ago displaced workers into the streets. Workers' cars are being parked in residential streets and community spaces, preventing residents, their guests, tradesmen, social workers, congregations and parents from parking. None of our community services including doctor, dentist, library, post office, vet, and two churches, etc has any parking for customers.

Investigation of possible sites for an additional car park demonstrated that the Brickfields site was the best of the possible sites where this facility could be provided.

The Parish Council's questionnaire following the July 1st 2018 meeting produced the result that 125 (59%) people oppose the development of this site for the construction of 110 houses compared to 87 (41%) who supported it. However, 161 residents (85%) 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 29 (15%) who opposed it.

West Malling Parish Council supports 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. An additional car park is badly needed in the short term. The Parish Council would support a mixed use development on this site, including a business car park, enabling housing, and would approve it as a potential site for a new GP surgery.

WMPC would like a specific reference in the Plan to support the continued sustainability of West Malling as a rural market town by identifying a site for an additional car park, preferably on this site.

East of Offham Road, Manor Farm Site A on the map at p7.

This site (currently in the Green Belt) 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 and West Street, which we felt were 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 1st 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 125 residents (59%) and opposed by 87 (41%). The proposal to bid for these houses to be affordable housing of the type described above was supported by 139 residents (69%), and opposed by 61 (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, 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. Since this has not been accepted, then we oppose the release of this land from the Green Belt as we see no exceptional circumstances to do so for such a small number of houses, particularly since the plot creates in this location a pleasant open rural edge to the town.

Broadwater Farm- north of Kings Hill

Part of this development lies within our parish. West Malling Parish Council did not oppose development of Kings Hill. The site as a former Airfield was flat, barren, lacking in natural flora and fauna, and without public access. Broadwater Farm by complete contract contains two Conservation Areas, a network of Quiet Lanes, beautiful productive countryside, and is extensively used for recreation by walkers, cyclists and horse riders.

We believe that:

- a) the development will harm the formally designated Quiet Lanes network which recognises the peaceful countryside feel to the area,
- b) the development harms the landscape of the area, being productive open fields forming part of the belt of the "best and most productive soils in the County" , with broad sweeping views to the North Downs and the Greensand ridge above Wateringbury.
- c) the proposed access route from "Kings Hill North" to the bypass at West Malling Station will cut across the Conservation Area of New Barns and Broadwater, and the undeveloped part of Broadwater Farm. However sensitively it is designed, it will introduce an urban feature to a protected rural agricultural landscape.
- d) the access route, if it joins the by-pass opposite the entrance to West Malling Station, will provide a direct access into Swan Street, which is both narrow and congested.
- e) the proposed northern boundary of Kings Hill North, 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.
- f) 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. It is unfortunate that we have yet to see plans for the design of junctions between the A20 and Lunsford Lane and New Hythe Lane, and the A228/A20/A228 junction. It is therefore not possible for us to gauge their effect on the landscape or whether they will be able to absorb this amount of additional traffic.
- g) we **support** the policy that there should be no vehicular access onto the rural lanes network surrounding 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.

IF the development is approved for inclusion within the Plan, we would prefer to see the boundary drawn further to the south by:

- a) incorporating Hoath Wood within the development, as we understand Berkeley Homes are now the owner.
- 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.
- d) Liberty Trust in the last week have announced that they intend to introduce five plots to the Local Plan, totalling some 500 houses. (Sites in yellow on map below.) There has been little opportunity to consider these sites but our initial view is that the three westerly sites, which were formerly employment land, would be much less damaging environmentally than the use of Broadwater Farm, and should be used to reduce the extent of the development.

The public survey demonstrated that the majority of residents agree with us on these points 178 (85%) of respondents oppose this extension of around 1,000 houses, compared to 31 (15%) who supported it.

The Parish Council believes all possible efforts should be made to reduce the extent of the development, drawing the northern boundary further away from the Conservation Areas of New Barns and Broadwater.

LIBERTY PROPERTY TRUST UK



Kings Hill Phase 5 Masterplan, Kings Hill, Kent

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 Kings Hill Phase 5 Masterplan
 Kings Hill
 Kent
 Development Boundaries
 DATE: 01/11/2017
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GP Surgery

West Malling GP Surgery is a vital service to residents, particularly those who have chosen to live in one of the four residential developments focussing on retired people. The practice has surgeries in West Malling, Leybourne and Kings Hill. The arrangement for prescription services with the pharmacy across the road makes it a particularly convenient location. The High Street premises has been sold, and is currently rented, but cannot remain so permanently. The NHS is encouraging practices to serve around 30,000 patients in comparison to the 20,000 of the current practice. Out of hours, and specialist clinics are held variously at Kings Hill or West Malling premises. East Malling Parkside, Brickfields and Offham Road sites are all within the catchment area of the West Malling practice, as are the still growing communities of Leybourne Chase, and Kings Hill.

The Infrastructure Delivery Plan records the need for Thornhills Practice, not part of a District Centre, to expand to accommodate new patients from, presumably the Parkside development. However, neither the Local Plan, nor the Infrastructure Delivery Plan refers to the need to make provision for a new and expanded surgery at West Malling.

WMPC wishes to see the Borough Council recognise that the West Malling Surgery will need to respond to the increased housing in the Local Plan, and that a surgery is an important part of the services of a District Centre.

NIAB/East Malling Research Station

Though outside our Parish, we are concerned for the future of NIAB/EMRS and the historic centre of East Malling. We consider Bradbourne House is a very important building together with its setting in historic parkland, part of which is Conservation Area and part of it is we understand covenanted to the National Trust. We agree with the views of East Malling and Larkfield Parish Council that an access further north than the one being currently considered would be preferable and less damaging to the listed buildings to the south of the site.

WMPC opposes this development of 205 houses because of its impact on these historic features, and the local road network. An application for a lesser number is to be submitted and this would be welcome.

Teston Road- "Kings Hill remainder"

We support the intention to provide access to and from this site only via Kings Hill. 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.

Aylesford Newsprint

Though not within our Parish, the extent of this brownfield site means that were any part of it to be allocated for housing, it could have a welcome impact on the demand for housing in more sensitive sites in Malling area. The Parish Council was in sympathy with an earlier application as it was a "brown field" site. However, in June 2018 the Borough Planning Officers issued a report proposing the application be refused. We understand the site is being marketed for employment uses, but that the promoters are having some difficulty selling employment land. (We were advised of this position also by Liberty in relation to their newly promoted sites.)

In the light of this, the Parish Council support the provisions of Policy LP35.

In particular, the Council feel it is essential that there should be a Master Plan and that the present private access through to Station Road from Bellingham Way should be opened with suitable improvements.

This is because the main accesses to the site are currently along Leybourne Way, Larkfield from the A228 and nearby junction 4 to the M20, and also New Hythe Lane (subject to a Weight Restriction) and Lunsford Lane to the A20 (London Road), Larkfield.

The following Housing sites were Submitted in the "Call for Sites", but not adopted by TMBC.

WMPC wishes to support the Borough Council's decision not to allocate these sites for development.

We anticipate developers may seek to renew their application through this consultation period and so for the avoidance of doubt we record our views on these sites below.

All these sites are shown on the map below. The site numbers refer to designations in the Call for Sites exercise.

1 Site 220 - Land at Teston Road/St Leonards Street junction

This site was assessed as Unsuitable by TMBC and we agree. It is outside the confines of West Malling and would further erode the separation of distinct communities.

2 Site 228 - Land at Eden Farm

This site was assessed as Unsuitable by TMBC and we agree. Development of this isolated site following the expansion of car parking at the station would increase the suburbanisation of the area, harming the setting of the listed station building, and detracting from the rural setting of the town presented to the traveller using the station. This site lies within the area proposed to form part of the extended Green Belt.

3 Site 229 - Lucks Hill

Development of this site, outside the confines of West Malling and East Malling, would further erode the separation of distinct communities. Access to this site from Swan Street/Lucks Hill would be hazardous given the proximity of two road junctions and the adjacent school. Winterfield Lane has no pavements.

The site lies in the area proposed as an extension to the Green Belt.

4 Site 232 - Opposite 170 Offham Road Green Belt

This site was assessed as Unsuitable by TMBC and we agree. Development on this site would damage the setting of the 12th Century St Leonards Tower, a Grade 1 Listed Building, the former garden and Laundry of historic Malling Place, and the rural setting of St Leonards Street.

5 Site 234 - Fartherwell Road Green Belt

This site was assessed as Unsuitable by TMBC and we agree. It is not within the village envelope. The surrounding narrow roads cannot accommodate additional traffic. Development on this site would feed onto Norman Road, Fartherwell Road (nb not Fartherwell Avenue), Offham Road and West Street. All of these, especially Norman Road and Fartherwell Road, are narrow and congested. Offham Road and Norman Road are further restricted by on street parking.

6 Site 265 - Lavenders Road

This site was assessed as Unsuitable by TMBC and we agree. A larger site, incorporating this land, has been proposed in an Outline Planning Application (TM/18/02093/OA) which is opposed by the Parish Council and has attracted over 120 public objections. The site lies within the proposed extension to the Green Belt.

7 Site 282 - North of Norman Road

This site is outside the village envelope and immediately adjacent to the community-owned Macey's Meadow orchard and nature reserve. Access onto Norman Road would be very difficult and the local road network cannot handle additional traffic. This site has been the subject of planning applications in recent years, all of which have been refused by the Borough Council, and the most recent refusal was challenged at appeal in 2016, where the refusal was upheld on Green Belt and lack of need grounds.

8 Site 299 - East of Offham Road. Green Belt

A small part of this site has been put forward in the Local Plan (site A on the map below). WMPC does not support development on the site as a whole. It would mean a loss of valuable open green space and the local road network cannot support the additional traffic.

9 Site 325 - West of Fatherwell Avenue Green Belt

10 Site 326 - North of Offham Road Green Belt

11 Site 327 - West of West Malling Green Belt

Together with site 5, these three sites all lie within the Green Belt. All feed onto Norman Road, Fartherwell Road (not Avenue) and Offham Road and West Street. All of these, especially Norman Road and Fartherwell Road and West Street are very narrow, and further restricted in Offham and Norman Roads by on street parking.

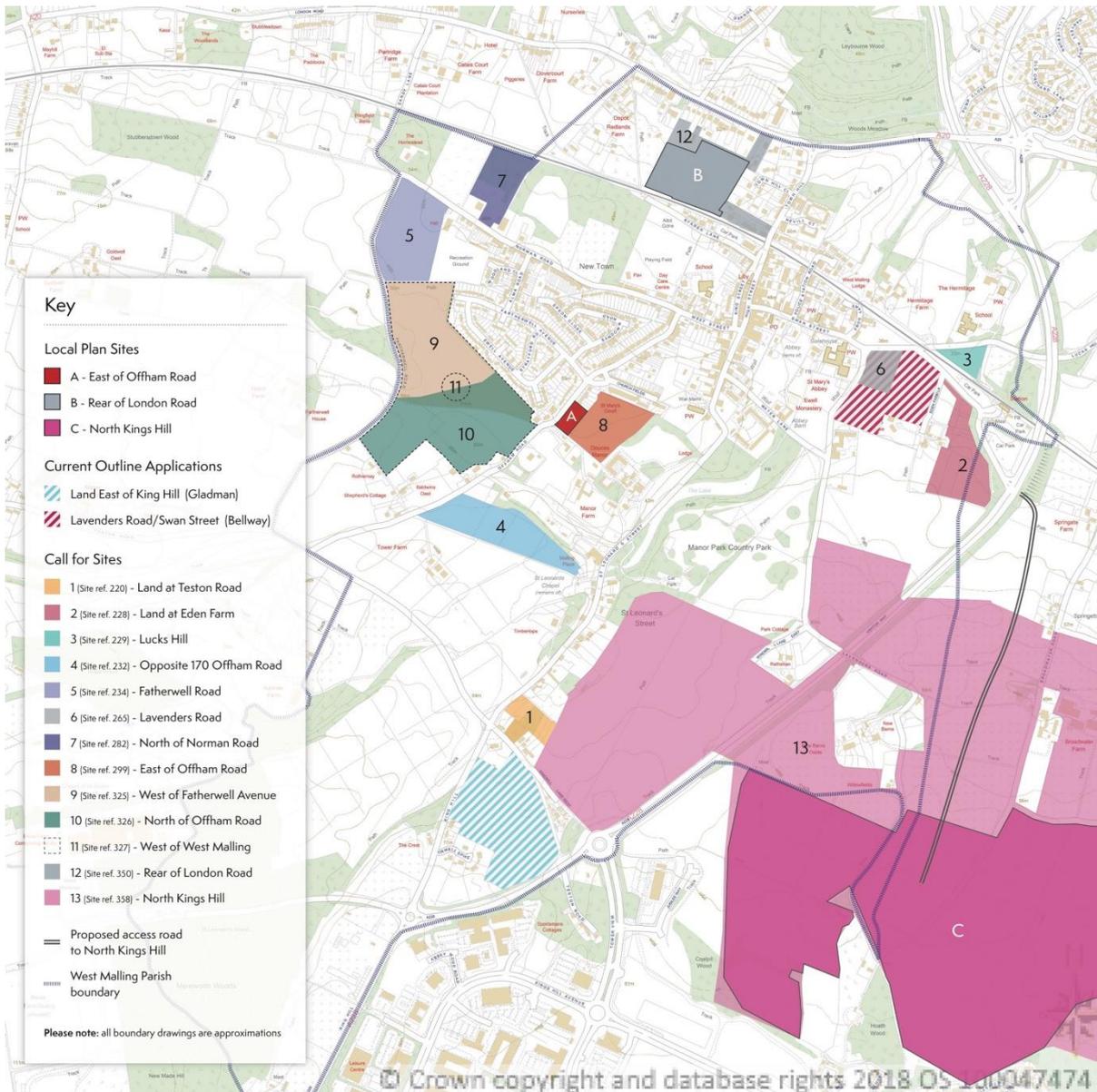
12 Site 350 - Rear of London Road Green Belt

TMBC assessed this site as Suitable but Undeliverable. The bulk of the site is now included in the Local Plan (site B on the map) which the Parish Council supports, if developed to include a car park primarily for workers. .

13 Site 358 - North Kings Hill- a further extension of the Broadwater Farm strategic site.

WMPC is opposed to development of this huge site (160 hectares) which would severely compromise the New Barns, Broadwater Farm and Mill Street Conservation Areas. It would effectively join West Malling to adjacent communities. This land is proposed as new Green Belt in the Local Plan.

Part of the site is allocated in the Local Plan (site C on the map).



Transport Issues

In a section dedicated to Transport we draw the attention of the Inspector to the following shortcomings.

- The future of the only direct bus link to Maidstone Hospital between the Malling villages from Wrotham Heath to East Malling is in doubt, and should be safeguarded.
- There is no bus link along New Hythe Lane/New Road for pupils of Larkfield North to travel to The Malling School, and residents of Malling villages to travel to the Civic Leisure Centre on New Hythe Lane. Developer contributions should be considered to fund such a route.