

## **PART TWO - Evidence in Support of Extending the Green Belt to Wateringbury Road**

1. WMPC has argued for an extension to the Green Belt since the 1990s.
2. It is consistently well supported by our residents.
3. Following a Public Consultation meeting WMPC has received to date exactly 100 response forms on this issue.
4. 89 supported the option of extending the Green Belt. 2 supported the anti-coalescence policy, 3 supported either extending the Green Belt and/or the anti-coalescence policy, and 6 supported no change.
5. WMPC wishes to see the boundary redrawn broadly along Wateringbury Road and Pikey Lane for the following reasons:
  - a. To retain a clear separation between East and West Malling and Kings Hill community to avoid the merging of these three communities. The green fields between them have already been lessened by permissions on King Hill of around 150 houses, and Forty Acres. The Call for Sites has generated new proposals in Stickens Lane, Clare Lane, Mill Street and Red Hill, which will erode it further if approved. The redrawing of the Green Belt is necessary and urgent.
  - b. To protect the rural setting of the historic town of West Malling. West Malling Parish straddles the current Green Belt boundary, which runs along the western edge of the built-up area. Open land to the west of the town is protected within the Green Belt, whilst land to the east of the town lies outside the Green Belt. Unfortunately, the Scheduled Ancient Monument of St Mary's Abbey lies on that vulnerable eastern flank of the town.

The town is a very popular place to live, and this division has resulted in pressure from developers on the eastern side of the town, which has continued to the present day. We have had to fight two appeals which would have destroyed the Farm-Abbey-Town landscape in recent years. Such a boundary would protect the Conservation Areas of West Malling, St Leonards, and Broadwater and New Barns.
  - c. WMPC and EMLPC have successfully persuaded KCC to Register a Quiet Lanes network under Section 268 of the Transport Act, 2000. These lanes which include all or parts of Lavenders Road, Broadwater Road, Pikey Lane, Stickens Lane, Well Street and the Heath, reflect the tranquil and rural nature of the lanes by giving signage priority to pedestrians, cyclists and horse-riders.

This recognition should be reinforced by being mentioned within the Local Plan.
  - d. To preserve the Openness of the countryside surrounding West Malling.
6. The three parishes of West Malling, East Malling and Larkfield and Leybourne jointly commissioned a proof of evidence by Mr K Goodwin in support of their argument for an eastward extension of the Green Belt. Within this document Mr Goodwin lays out the results of his survey of the land north and south of the railway line broadly as far as east as Wateringbury Road and demonstrates how this area would fulfil the special circumstances required to justify such a boundary change. In Area 1 he notes that such a boundary would include the KCC Manor Park Country Park.

7. This is the boundary we are again suggesting should be adopted at the Local Plan review, which was supported by TMBC in the earlier draft review. We have received a copy of the submission of East Malling and Larkfield Parish Council to the Reg 18 Consultation which confirms that they remain of the same view. West Malling Parish Council objects to the inclusion of Broadwater Farm site as a very large housing development. It is however accepted by both Parish Councils that the loss of Forty Acres will need to be reflected in a new Green Belt boundary, though the area accepted by the developer as able to be included in Green Belt should be incorporated as offered. WMPC believes that, if the Broadwater site is proposed by the Borough Council, it should be limited to Pikey Lane as its northernmost extent to limit its effect on the landscape should it extend over the top of the ridge. WMPC believe that if the development is permitted, it should access the A228 via the existing Kings Hill road network in order to be sustainable. If this connection is not made, very long diversions would be necessary for residents of Kings Hill North to access supermarkets and the GP, and for existing Kings Hill residents to access the new primary and secondary schools and medical centre on Kings Hill North.
8. The Parish Council will submit the document in full to TMBC, but we copy below the most relevant extract in paragraphs 43 to 59.

#### **Appendix - The Assessment by K. Goodwin**

43. *In my view there are two methods of approaching the suggested extension beyond Watringbury Road. The first is to assume that the proposed extension of the Green Belt in the Submission Local Plan is in place and to then only consider the nature of that north-south extent of land that lies between Watringbury Road and Kiln Barn Road. The second is to assume that this is not in place and therefore in order to justify the additional extension between Watringbury Road and Kiln Barn Road it is first necessary to consider the contribution that the western land parcels make to the Green Belt extension. In my view this second approach is the only logical approach.*
44. *Otherwise the argument is at risk of one being run in isolation and seeking to create a Green Belt that only has one small connectivity with the existing Green Belt to the southeast of Kings Hill, east of Watringbury Road. The purpose of the examination of the Plan is to identify and demonstrate that it is sound. The further extension can only be sound if the extension as proposed within the draft plan is sound as well. To just consider in isolation the area between Watringbury Road and Kiln Barn Road would be to consider a 'new' Green Belt, rather than an extension.*
45. *Having adopted the above method of assessment, I carefully walked the whole of the subject area, both west and east of Watringbury Road. There is a good network of public footpaths, country lanes and Quiet Lanes (under Section 268 of the Transport Act, 2000) that criss-cross the countryside here providing excellent access for those who wish to enjoy the natural beauty of this part of Kent, steeped in its history as part of the Garden of England. Extensive areas are given over to arable farming, particularly in the north of the area, with apple growing particularly evident to the south.*
46. *Whilst I have walked the whole of the areas and therefore personally seen all the parcels of land, for convenience and conciseness, I have set out my findings by reference to five areas, as shown on the plan attached at Appendix D. These are essentially:*
  1. *Land west of the A228;*
  2. *Land between the A228 and Watringbury Road, north of the railway;*
  3. *Land between the A228 and Watringbury Road, south of the railway.*

## Area 1

47. *This is an irregular area of land between the existing boundary of the Green Belt on the north side of the A20, on the existing Green Belt boundary to the west of West Malling, the A228 and part of the northern edge of Kings Hill. It comprises a number of smaller parcels of land separated broadly north – south by public footpaths MR141 and MR143 and east-west by Lucks Hill, footpaths MR116 and MR142.*
48. *On the eastern side of St Leonards Street it includes Manor Park Country Park. The Park also falls within the West Malling Conservation Area that includes extensive areas of land on the east side of the village, together with the Scheduled Ancient Monument (SAM) at St Marys.*
49. *North of the railway line and to the east of the settlement boundary the land is predominantly open, is within the conservation area and forms an important setting for West Malling from the north-east. This area being undeveloped maintains an important gap between the settlement and the A228.*
50. *South of the railway land and as far as Lavenders Road, where it crosses the A228, the land is either within the SAM, and/or the conservation area, and/or the Country Park; or is used for livestock, grassland or arable farming. Again these areas that are sparsely developed, save from housing on the east side of St Leonards Street, maintain an important gap between the existing settlement and the A228.*
51. *The pressure to develop within this area is reflected in the Lavenders Road application and appeal (Appendix B). It is also reflected in the areas promoted through the Call for Sites and shown on my Figure 1.*
52. *When considered against the five tests in the Framework:*
  - a) *to check the unrestricted sprawl of large built-up areas – the designation of this area will aid in preventing the outward spread of West Malling up to the A228 and the potential development of sporadic parcels of land;*
  - b) *to prevent neighbouring towns merging into one another – the designation of this area will aid in the prevention of West Malling merging across the A228 with Leybourne to the north and with Kings Hill to the south. The present gap, particular to Leybourne at the closer points, is narrow and therefore vulnerable;*
  - c) *to assist in safeguarding the countryside from encroachment – the designation of this area will prevent encroachment, whether by an extension of an existing settlement or sporadic isolated development of sites. It would also complement the existing designation of some of this area as a country park;*
  - d) *to preserve the setting and special character of historic towns – the designation will protect the eastern setting of West Malling and its special historic character. Preventing development here for this reason was recognised in the appeal decision on Lavenders Road; and*
  - e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – the designation of this area will mean that developers will need to focus on brownfield land rather than development of greenfields and the countryside.*

## Area 2

53. *This is an irregular area of land between the A20 to the north, East Malling to the east and the railway line to the south. It is crossed by a number of footpaths and country roads. In particular footpath MR119 affords some wide views to the north and from the crest of the hill at the junction of footpaths MR119/MR120 the land falls away to the A20, providing some panoramic views from here. Aside from the land directly associated with Pine Toll and the Grade 1 listed Clare House, the majority of the land is used for arable farming and aside from hedge lines and some treed areas, there are wide open areas of rolling countryside as the topography rises to the south.*
54. *When considered against the five tests in the Framework:*
- a) *to check the unrestricted sprawl of large built-up areas – the designation of this area will aid in preventing the southern spread of Leybourne up to the A228 and East Malling from the east. This area is already under threat through an appeal by Wates to be heard at inquiry, relating to land to the south of the A20 (Appendix C), that should it be allowed would mean that development this far west would bridge the A20, leading to ribbon development towards the junction of the A228/A20;*
  - b) *to prevent neighbouring towns merging into one another – the designation of this area will aid in the prevention of Leybourne merging across the A228 with West Malling to the west. The present gap to Leybourne at the closer point is narrow and therefore vulnerable and the Wates appeal scheme whilst the layout is illustrative demonstrates how this gap would be significantly eroded;*
  - c) *to assist in safeguarding the countryside from encroachment – the designation of this area will prevent encroachment, whether by an extension of an existing settlement or sporadic isolated development of sites and safeguard the future of the arable fields on the south side of the A20. The southern part of this area closer to the railway line, being more remote from the A20 is very rural in character and so any change would be more acute;*
  - d) *to preserve the setting and special character of historic towns – the designation will contribute to the protection of the wider eastern setting of West Malling and its special historic character, together with the western setting of East Malling. The church spire in West Malling is visible in views southwest from the ridge line, as other parts of the village, even from the eastern side of the A228. Protection of this area will also preserve the setting of historic Clare House, its Park and its wider curtilage; and*
  - e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – the designation of this area will mean that developers will need to focus on recycling land rather than development of greenfield land and the countryside.*

## Area 3

55. *To the south of the railway line the topography of the area changes, as does the nature of the use of the land areas. Here the principal crop is apples towards the southern edge, with interspersed areas of arable crop and rough grass. It is noteworthy here that further areas of Kentish apple orchards will be lost as Kings Hill pushes north, with the strategic housing site at Broadwater Farm. To the east of the proposed northwards extension of Kings Hill, between this and Wateringbury Road there is East Malling Heath and the Nature Reserve and mature woodland.*

56. *Wateringbury Road that forms the eastern edge of the Councils proposed extension boundary gradually rises from north to south. The rise is from around 50m at the southern edge of East Malling to around 100m at the current edge of the Green Belt, east of Kings Hill. Whilst this, as a broadly straight line, could form a clear boundary to a new eastern extension of the Green Belt, we consider that there is also a case for pushing that boundary further east, to provide greater protection to the rural countryside here.*
57. *As noted above this is already a gradual expansion of Kings Hill north with the loss of apple orchards through the proposed strategic housing site at Broadwater Farm. This northwards expansion, with gradual southwards extension from East Malling/Ditton, is likely to lead to the closure of the existing settlement gap and harm to the setting of East Malling and Mill Street.*
58. *These apple growing areas are Priority Habitats as Traditional Orchards.*
59. *When considered against the five tests in the Framework:*
  - a) *to check the unrestricted sprawl of large built-up areas – the designation of this area will aid in preventing the northern and eastern spread of Kings Hill towards East Malling and Mill Street. The Council has already designated Broadwater Farm as a strategic housing site that will extend built development further north. The area to the east of Kings Hill up to Wateringbury Road becomes even more vulnerable in this respect;*
  - b) *to prevent neighbouring towns merging into one another – the designation of this area will aid in the prevention of Kings Hill merging with East Malling/Mill Street to the north;*
  - c) *to assist in safeguarding the countryside from encroachment – the designation of this area will prevent encroachment, whether by an extension of an existing settlement or sporadic isolated development of sites and safeguard the future of the fruit fields on the south side of the railway line;*
  - d) *to preserve the setting and special character of historic towns – the designation will contribute to the protection of the wider eastern setting of West Malling and its special historic character, together with the southern setting of East Malling and also the Mill Street and New Barns and Broadwater Farm Conservation Areas; and*
  - e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – the designation of this area will mean that developers will need to focus on recycling land rather than development of greenfield land and the countryside.*