

Regulation 18 Consultation on draft Local Plan

October 2022

General considerations on the formation of the Local Plan

- West Malling Parish Council made a comprehensive contribution to the Regulation 18 consultation of the previous draft Local Plan and have once again sought to express the views of our local residents. These are summarised in Part 3.
- Given the recent vulnerability of West Malling and the surrounding area to unwanted and inappropriate development, we would ask Tonbridge and Malling Borough Council (TMBC) to increase the protection of the Green Belt and Conservation Area for our historic town within this Local Plan.
- Our priorities for any new local plan settle on six key areas which we urge TMBC to embed into the new Local Plan. These include:
 - **Protection for the rural setting of our historic town** by continued support for the Metropolitan Green Belt to the west, and its further extension to the east, generally to the line of Watringbury Road, East Malling. We welcomed the Borough Council's support for this proposal in the previous rejected draft Local Plan and look forward to this support continuing.
 - **Appropriate protections for the distinct heritage of our town**, including both significant Ancient Scheduled Monuments of St Mary's Abbey and St Leonard's Tower, but also extending to the large number of listed and non-listed heritage assets present in West Malling Conservation Areas and beyond. We seek an urgent extension to the Conservation Area to reflect the recent Appeal decisions regarding land close to St Marys Abbey.
 - **Action on critical local infrastructure**, including the return of General Practice or medical facilities to the town with increased appointment availability, increased Primary school capacity, as well as roads, cycle lanes and other transport links;
 - **Appropriate protections for our green spaces** that are one of the most valued assets of our local area and vital for the well-being of residents and its attraction as a place to visit. We have listed a number of sites for new protected 'Green Space' status.
 - **A long sighted consideration of sustainability issues** to better help West Malling and its residents respond to the climate emergency and associated environmental issues;
 - **Creating a community that people want to live and work in**, by ensuring the right conditions for business including adequate parking and transport options.

PART 1 Response to Regulation 18 Consultation Questions

1. Which elements should feature in the vision for the borough in 2040?

- 1.1 All elements are important. WMPC places particular importance on those which concern biodiversity, landscape and open, accessible countryside and support for safe and healthy lifestyles. We also favour well designed, accessible communities which reflect local character and the need to have regard to sustainable development.

2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan?

2.1 Yes, but it must be recognised by TMBC that communities expected to absorb new development should benefit from improved facilities to cope with increased numbers. West Malling has seen a large influx of Kings Hill residents to our churches, churchyard, shops, businesses and restaurants. However, since the construction of the bypass, we have seen no improved facilities such as increased parking or improved public transport to cope with these numbers.

2.2 Activities at St Mary's Church have suffered from the loss of parking, and the Blood Transfusion service also cited parking difficulties in their decision to withdraw from the town. At the same time, we have seen the removal of some bus services, the loss of our GP practice premises, the imposition of parking charges and the cessation of support for our public toilets. All of these have lessened the quality of life for our residents. We would welcome greater emphasis on the needs of established centres where new development is planned.

3. Which quantum options for the spatial strategy do you prefer?

3.1 Option one. Meeting the assessed need.

4. What are your reasons for selecting this particular quantum option for the Local Plan?

4.1 WMPC and TMBC believe the Housing Targets are already too high. Beyond meeting assessed need using the government method of calculation, allowing for a further 10% would result in an unacceptable level of harm.

5. Which spatial strategy option do you prefer?

5.1 None

6. What are your reasons for selecting this particular spatial strategy option for the Local Plan?

6.1 None of these strategies appears to meet West Malling's needs.

6.2 Spatial Strategy 5 comes closest, but since the boundaries are indicative, it is difficult to say.

6.3 WMPC places great importance in the need for protection of our town's historic importance, and its rural setting. We therefore favour a spatial strategy which ensures separation of WM from Kings Hill, East Malling, Larkfield and Leybourne, and a separation of these villages from one another.

6.4 We believe our neighbouring Parish Councils also support this emphasis on separate, rural communities

6.5 Given the need to meet Government Housing targets, we recognise the difficulty in a Borough where so much land lies within areas of special protection. However, we do not wish to see further merging of Maidstone and Malling which would result from the options concentrating development in the north-east of the Borough. Though the concept of a garden community is an attractive one, we have difficulty with supporting it without a chosen location.

7. Do you agree with the findings of the strategic policy options assessment in Chapter 4 of the Interim Sustainability Appraisal Report?

7.1 WMPC will not be answering this question.

8. Do you agree with the findings of the individual site assessments in Appendix D of the interim Sustainability Appraisal Report?

8.1 WMPC will not be answering this question.

9. Do you agree with this set of strategic matters?

9.1 WMPC will not be answering this question.

10. Which strategic matters should be priorities in the Local Plan?

10.1 WMPC will not be answering this question.

11. What are your reasons for selecting these particular strategic matters as priorities for the Local Plan?

11.1 WMPC will not be answering this question.

12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?

12.1 Yes. Under the current regulations, the only safe policy is to minimise the risk of failure of the Local Plan by meeting the housing needs using the Government's prescribed process. However, there are a number of issues with this approach which argue for being prepared to exploit any flexibility in the future should this situation change. For example:

- (a) Current population statistics used by TMBC are based on 2014 data, and are known to overestimate actual lower birth rates and therefore Housing Needs based upon them;
- (b) Survey data currently used by TMBC may not be a reliable basis for predictions as Covid has affected population figures particularly amongst the elderly, Covid and Brexit have affected working patterns and demand for office space, Brexit has affected employment data and the relative economic buoyancy of the south-east economy;
- (c) The current cost of living crisis has affected the housing market in the short term, and will do so for an unknown period into the future;
- (d) The political landscape has been changing for some time, with an emerging acceptance that the Housing Targets have impacted unfairly on the south-east and particularly on authorities with significant areas of Green Belt. A number of statements have been made at Ministerial and Prime Ministerial level of the intention to 'abandon top-down housing targets', but without any accompanying legislation to put this into effect;
- (e) The possible use of 'liberalised planning policies' in Investment Zones is an unknown factor which may alter the impact of Local Plans and the public contribution to them.

13. Do you agree that the Local Plan should allocate a mix of sites (small, medium and large) to help maintain supply throughout the plan period?

13.1 Yes.

14. Do you agree that the Local Plan should require a specific mix of dwelling types (e.g. flatted, terraced, semi-detached) on large development sites to meet the range of householders' needs?

14.1 Yes, subject to this meaning a policy which supports an allocation for each site separately to suit local needs, rather than a blanket borough-wide policy. TMBC should stipulate that sites over a certain size require a mix of dwelling types, but the precise nature of this mix should be determined by local needs. Such a policy might also act as a tool to reduce traffic movements.

15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building?

15.1 Yes, but this should be a very low allocation reflecting the low priority compared to, for instance the need for genuinely affordable housing.

16. Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products?

16.1 No. The requirement to build homes to rent for priority lower income households is already covered by the legislation. Build to rent for commercial gain is not helpful in fulfilling that much greater need.

17. Do you agree with the windfall allowance methodology?

17.1 Yes. Calculation based on previous experience would seem a sensible approach. The windfall allowance from small sites is welcome.

18. Which housing matters are most important to you?

18.1 Each of these matters is of importance, however we would prioritise:

- infrastructure (schools, roads, healthcare, open space etc);
- the size of housing, with smaller 1 and 2 bed accommodation currently preferred;
- social housing, or the equivalent buy to rent products at 50-60% market value, with priority being given to key workers or those with a longstanding connection to West Malling and who work in the community;
- and the distribution of housing across the borough.

19. What are your reasons for selecting these particular housing matters as priorities for the Local Plan (outline briefly)?

19.1 'Affordable housing' at 80 per cent of purchase price or rent is unaffordable for many residents, and as the Reg 18 document states, the situation in TMBC has been getting worse for many years.

19.2 Many people employed in essential professional posts in nursing, police, teaching and social care are unable to purchase their own home. Reports from Joseph Rowntree Trust, Shelter and others have illustrated that that the problem is widespread in the UK, and particularly acute in the south east where house prices reflect high London wages.

- 19.3 WMPC does not accept the suggestion that a greater volume of house building will bring prices down, as the number of houses required to satisfy demand and to start to drive prices down in the area is simply not viable. This is to a large extent a symptom of having a rail connection into London and is evidenced by the way in which TMBC has maintained a high volume of construction over a long period of time, with prices remaining higher than the average for the South East and Kent according to a recent KCC Select Committee Report. TMBC itself accepts that it is impossible in any event to build sufficient houses to meet the demand in this popular part of the South East.
- 19.4 Shelter and Joseph Rowntree Trust reports suggest that in over three quarters of authorities low-income families are unable to purchase 'affordable housing' and are driven into the private rented sector where rents have also rapidly increased in excess of pay.
- 19.5 There is an urgent need for an affordable housing product which replicates Social Housing previously provided by Councils or Housing Associations at typically 50 to 60% of market rent or purchase price.
- 19.6 Locally, too high a proportion of new housing is of larger 4- and 5-bedroom houses, driving costs up even further, without meeting existing local demand which is for smaller properties.
- 19.7 New developments need appropriate infrastructure delivered in a timely fashion. If this is not done, it puts even greater pressure on the services provided for existing residents. The reduction in Government Grant for expanding, for instance, existing schools and surgeries means that additional capacity is increasingly found only on new developments, resulting in children and patients travelling much further to school and GPs with consequences for climate change and increased costs to residents.

20. Do you agree with the key economic development issues identified above?

- 20.1 West Malling Parish Council partly agrees with the key economic developments issues set out in the document. The first is the challenge of high land values and a shortage of employment land and premises for established and growing businesses, as well as those looking to local in the borough. We agree that this is a major issue facing the borough, and one that the Local Plan should be looking to address.
- 20.2 The loss of office accommodation in town and village centres to residential conversion is a significant factor in this, as well as the loss of town centre retail premises. Most importantly, the lack of suitable small office accommodation is a major limiting factor to enable SMEs to move from the start-up phase and homeworking to the point of employing staff and renting suitable premises. SMEs make up the majority of businesses nationally and can grow to become significant local, regional or national employers. It is imperative that these businesses are given the opportunity to grow and not become stagnant because of a lack of suitable employment land and premises. Further, the lack of suitable warehousing on a local or regional basis means that goods are transported longer distances, reducing employment opportunities in the borough and preventing businesses to locate here.
- 20.3 We note the explanation at 5.4.16 and the Local Plan must seek to balance the risk of losing employment land and premises to meet the requirements for residential premises set out elsewhere in the document. Increased residential development is of no benefit unless those occupying such premises have employment opportunities or the infrastructure requirements needed for self-employment. There is an important point to be made here with regard to the overall Local Plan, in that it must deliver on providing for residents at all points on the wage and skill scale and ensure that there is a mix in types of properties being provided.

- 20.4 WMPC agrees that lack of investment in strategic infrastructure and congestion on local transport networks is a key economic development issue. As the *Q3 2022 UK Business Confidence Monitor* states “transport problems continue to challenge businesses in Retail & Wholesale. In Q3 2022, 49% of companies cite transport problems as a growing source of difficulty.”¹ It is therefore essential that the Local Plan must look to address this issue. More locally, the *UK Business Confidence Monitor for the South East* reports that “transport problems also remain a prominent challenge for 27% of companies, around double the region’s historical average.”²
- 20.5 WMPC is unable to support the Local Plans objective of supporting land-based and agricultural diversification. The borough is blessed with a large proportion of high-grade agricultural land and given that security of food supply is an increasing concern to residents, pushing diversification at the expense of existing agricultural uses we believe to be the wrong choice. We suggest that the issue should be set out as “Maintaining land-based and agricultural uses and supporting diversification where it contributes to sustaining agricultural use, such as supplying accommodation for farm workers”.

21. Do you agree with the key transport issues identified above?

- 21.1 Mostly yes. However, we must recognize that the existing road network is at key times already full, and that further development will put increased pressure on these networks. In West Malling, parking in town already has a negative effect on the local economy and further development will have a highly negative effect on the local economy. Therefore, the Local Plan must seek transport methods that do not rely on private use of cars.
- 21.2 If approved, the delivery of the Lower Thames Crossing Project will overcome capacity on the M2 and M20 leading to severe mobility issues locally.
- 21.3 Rail is a key to transport in the borough, we welcome initiatives by Southeastern to improve the Ashford line with services into London Bridge and Charing Cross. Increase in population within TMBC will require increases in train services to cope.
- 21.4 We generally support the proposals listed at 5.5.26 however.

22. Which transport issues matter the most to you?

- 22.1 WMPC would encourage the prioritisation of:
- (a) Bus services – linking developments to services and places;
 - (b) Cycle routes – safe links between homes and schools, other service, places and public transport;
 - (c) Pedestrian infrastructure – safe links between homes and schools, other services, places and public transport;
 - (d) Rail – improving station access and links with cycling and walking routes; and
 - (e) Roads including junction improvements.

¹ Institute of Chartered Accountants in England and Wales (ICAEW), UK Business Confidence Monitor, Q3 2022: Retail and Wholesale, <https://www.icaew.com/technical/economy/economic-insight/business-confidence-monitor-sectoral/retail-wholesale>

² Institute of Chartered Accountants in England and Wales (ICAEW), UK Business Confidence Monitor, Q3 2022: South East, <https://www.icaew.com/technical/economy/economic-insight/business-confidence-monitor-regional/south-east>

23. What are your reasons for selecting these particular transport matters as priorities for the Local Plan?

23.1 To meet climate crisis there is a strong need to get people out of their cars and to use public transport and green alternatives such as cycling and pedestrian travel. The Local Plan should therefore seek to promote such means of transport above private car usage, both within new developments and within the existing communities. WMPC notes with alarm the reduction in local bus services due to KCC cutting subsidies to local services and also notes substantial government funding to KCC to provide new and innovative public transport services. Schemes such as car sharing, renting cars as and when have proved popular in cities and could be rolled out, perhaps with subsidy from 106 Agreements in TMBC. Most private cars spend most of their time parked, taking up road space, involving huge personal cost to achieve very little. This is outdated thinking and the Local Plan could seek to address this.

23.2 Safety is a major impediment to both cycle use and to pedestrian travel. So better segregation between such travel and motorised transport is key to increasing the use of non-carbon-based transport. New developments must prioritise the encouragement of cycle and pedestrian travel by providing safe dedicated cycle and pedestrian avenues to places people will wish to visit. This is difficult on rural roads where speed reduction may increase a sense of safety.

24. Would you support the implementation of cycling and walking schemes, where a reduction in road space including on-street parking may be required in some instances, to provide a network of quality, urban cycle routes?

24.1 Yes. We generally need to move away from the idea that households travel by privately owning their own transport.

25. What is your preferred strategy option for Tonbridge?

25.1 Strategic options for Tonbridge are matters for Tonbridge residents.

26. What are your reasons for selecting this particular strategy option for Tonbridge?

26.1 See above.

27. What should be the main role of Tonbridge Town Centre moving forward? Should the priority be shopping, or for leisure, social and cultural uses, or a balance of these?

27.1 See above.

28. Should the Local Plan include a more flexible policy framework for Tonbridge to allow the Town to respond to future market investment opportunities for a range of land uses and developments?

28.1 See above.

29. Do you have other thoughts above how planning policy should guide development in and around the town centre?

29.1 See above.

30. Do you agree with the key retail issues identified above?

30.1 Yes. WMPC broadly agrees with the issues identified by TMBC which affect local retailers. However, WMPC would disagree with 5.7.4. reflecting conversations with local retailers in West Malling which point to unaffordable energy prices as a real cause for concern that is making them apprehensive about the winter months ahead.

31. Is there anything more that the Council could do to make the borough's retail centres more attractive and successful?

31.1 Yes. West Malling not only provides services to the residents of West Malling and the wider population in the area, but trade also comes from day trippers drawn by West Malling's historical High St and rural location. Further residential development affecting the boundaries of West Malling will see the town joined with other urban areas, negatively affecting the town's rural character.

31.2 The Local Plan needs to protect the availability of parking as essential ingredients for the viability of the town centre. Free or cheaper parking would also encourage longer dwell times increasing both footfall and frequency of visit.

31.3 The Local plan could seek to offer a free bus service from local densely populated areas such as Kings Hill, Leybourne, Leybourne Chase, East Malling which allow younger and older residents without access to a car to visit the town centre and reduce pressure on local roads.

31.4 Another access opportunity is for a free bike scheme to be created between Kings Hill and West Malling along with designated bike paths both these suggestions would also support WMPC's efforts to tackle the climate emergency.

31.5 TMBC could support local independent retailers by making it easier to understand grants that are available to them e.g. The shop front scheme.

31.6 Securing the provision of local toilet facilities is critical in ensuring West Malling future viability as a rural service centre and thriving commercial high street. TMBC should work with WMPC to find a suitable site which is able to provide a long-term, affordable option for local toilet facilities.

32. Do you agree with this set of community facilities and infrastructure priorities?

32.1 WMPC believes that necessary infrastructure, including schools, community and healthcare facilities, should be put in place simultaneously with residential development rather than as an afterthought. The Council should be setting out its intention to adopt rigorous and meaningful measures and controls to encourage early construction of necessary infrastructure and safeguard against any failure to meet this vital requirement. Similarly, affordable housing elements of the developments must be built as soon as development starts, in order to provide suitable housing options for lower income families and individuals at the earliest opportunity.

32.2 Furthermore, adequate consultation on the pressures already facing local infrastructure should be required ahead of significant development taking place in a given area. In order to avoid alienating existing communities in the Borough, TMBC should consider how Section 106 funding can be acquired and utilised by lower-level authorities at the earliest opportunity rather than many years after the development has been completed.

- 32.3 WMPC would like to see more emphasis placed on the effective scrutiny of the long-term deliverability of infrastructure plans, including financial guarantees. In all future developments, and before planning permission is granted, deliverable infrastructure plans that fully comply with their planning obligations and the needs of the local area should be put into place. If necessary, developers should be required to provide financial bonds to act as guarantees in the event that they default on the required contributions to community infrastructure.
- 32.4 As an example of where this hasn't happened and the harm it has caused, relates to primary health care in West Malling and its surrounding areas. GP services were at crisis point and struggling to meet the needs of local residents. The planned medical centre at Leybourne Chase failing to materialise is a classic example of fragile services being stretched to their limits without necessary renewal and investment.
- 32.5 The plan should also set out how the Council intends to support those community resources that are reaching saturation. For example, with several developments for older people planned for the local area, considerable additional pressure will be placed on an already struggling primary care service and other care providers. Voluntary Organisations such as Age UK, who are able to provide community based preventative services, have seen a loss of grant from Local Authorities. West Malling's Community Centre was closed due to KCC's disposal of the asset to a property developer.

33. Should Local Green Space be designated in the Local Plan?

- 33.1 Yes. WMPC supports the creation of designated Green Spaces, as vital parts of a settlement and local community. In order to be designated as a local Green Space, a site must:
- (a) Be reasonably close to the community it serves; and
 - (b) Be demonstrably special to the local community, either in terms of its beauty, historic significance, recreational value, tranquillity or richness of wildlife.

34. If yes, do any potential sites meet all of the criteria set out in the NPPF?

- 34.1 WMPC believes that the following sites meet the NPPF criteria. They are all open to the public and WMPC would like to pursue their designation as Local Green Spaces:
- (a) Old County Ground Norman Road. Owned by WMPC. Site of first advertised Cricket Match in Kent in 1705. Birthplace of Kent County Cricket Club. Cricket and Football teams played here ever since.
 - (b) Macey's Meadow Norman Road. Twenty-acre Community Orchard, with cherry, apple, pear and nut trees, plus wildflower meadows, insect and bird nesting boxes, and beehives. Owned by WMPC. Maintained by volunteers. Annual Applefest Festival.
 - (c) Manor Park Country Park. St Leonard's Street. Former landscaped garden of listed Douces Manor which overlooks the park. KCC owned Country Park with children's play equipment, lake, grazing and parkland, with café.
 - (d) St Leonard's Tower. St Leonard's Tower. One of most complete 11th century Norman Keeps in the country. Owned by English Heritage. Small lawned curtilage for visitors. WMPC has concerns about recent lack of public access.
 - (e) Village Green. High Street opposite Ryarsh Lane junction. Site of former Lock Up. Now site of significant trees, benches and 'Hope' statue by Sarah Cunningham.
 - (f) Toll House Green. Highway green at intersection of Teston Road and St Leonards Street. Former site of toll house. Attractive entrance to town. Bus stop and village sign with bulb flower beds.
 - (g) Banky Meadows. Police Station Road to London Road. Open meadow bounded by deeply incised valley of stream from foot of St Leonards Tower. Grazing land open to the public for as long as can be remembered. Very well use paths to Leybourne and Larkfield.

- (h) Scared Crow Green Churchfields. Small grassed area and verge belonging to TMBC. Site of Bouncy Castle at Jubilee.
- (i) Ewell Avenue green. Small grassed area on bend of Ewell Avenue. Attractive amenity for informal play for children.
- (j) Woodland Close green area at junction with Alma Road. Thought to belong to the now-liquidated developer and therefore Crown Property. Attractive setting at Close entrance.
- (k) Norman Road Playing Fields. Norman Road. Owned by WMPC. Very well used. Sport pitches, play equipment, tennis courts and Village Hall. Traditional setting for Village Carnival.

35. Should the Council be seeking more than the 10% biodiversity net gain, if viable?

35.1 Yes. The Local Government Association defines Biodiversity Net Gain (BNG) as an approach to development or land management that aims to leave the natural environment in a better state than it was beforehand. In planning policy, an important element of Biodiversity Net Gain (BNG) is the fact that it is measurable. Under the Government's flagship Environment Bill, both Town and Country Planning Act (TCPA) and Nationally Significant Infrastructure Project (NSIP) developments will need to deliver a minimum 10 per cent BNG. However, WMPC would encourage TMBC to look at how the borough can go further to protect and reverse biodiversity decline.

36. Should the Council allocate sites specifically for biodiversity net gain within the Local Plan?

36.1 Yes. WMPC would urge the consideration of the sites put forward for designated Green Space status at Q34.

37. Which design matters are most important to you?

37.1 High quality design is vital in order for new developments to gain the consent of the local community and to create civic pride in new structures as they are added to a settlement. WMPC would prioritise three key design factors for new development:

- (a) Development should be sympathetic to the local character, history and landscape of their setting. This should include the use of regional design codes, which encourage the use of locally sourced and traditional materials where possible;
- (b) Development should have environmental sustainability at its heart, employing all practical and economically viable measures to save energy, reduce heat loss and reduce water consumption. For example, WMPC is of the view that all new builds should include photovoltaic panels on their roofs and larger developments should make appropriate use of large ground-source heat systems.
- (c) Developments should help create safe, inclusive and accessible places that promote health, well-being and personal development.

38. What are your reasons for selecting these particular design matters as priorities for the Local Plan?

38.1 WMPC prioritises the above design elements because of its focus on maintaining the heritage aspects of our town, making West Malling a sustainable community that is fit for the future and working with developers and others to create a safe, desirable place to live and work.

39. Are there any other locally significant built, historic issues or sites which you consider are important to the borough and should be addressed in the Local Plan?

39.1 Yes. St Mary's Abbey in West Malling is an Ancient Scheduled Monument founded circa 1090 and home to an order of Benedictine nuns. The building is thought also to be the only place where *Chaenorhinum origanum*, a native of the Iberian Peninsula and the Balearic Islands, grows wild. Elsewhere in this response, we ask for an extension of the Green Belt and WM Conservation Areas to protect it further from development.

39.2 West Malling High Street has many listed buildings as does Swan Street and Douces Manor is also of great historic interest as a heritage site where World War 2 pilots were billeted and established the basement "Twitch Inn". The "Twitch" now forms a local Heritage Centre, run by the Malling Society displaying many memorabilia and hosting visitors from a wide area.

39.3 St Leonard's Tower is a Norman keep, which is owned and managed by English Heritage and which is a much-loved symbol of the town. WMPC has concerns about the lack of public access in recent years.

40. Do you agree that the set of factors listed in para 5.11.7 should be used to determine if exceptional circumstances exist to justify alterations to Green Belt boundaries?

40.1 Only if it is made clear within the policy that these boundary changes can include additions as well as removals of land from the Green Belt, and that the aim will be to maintain or increase the extent of Green Belt protection in the interests of Climate Change and Biodiversity.

41. Do you agree that there are exceptional circumstances, at the strategic level, for altering Green Belt boundaries (in principle) to help address assessed development needs?

41.1 Yes. However, we would urge that land used within the Green Belt focusses on brownfield or despoiled land as has been achieved at Holborough and Peter's Pit, now Peter's Village.

42. Please indicate your preferred strategic policy option for the area beyond the outer Green Belt boundary.

42.1 Option one - the extension of the Green Belt.

43. What are your reasons for selecting this policy option for the area beyond the outer Green Belt boundary?

43.1 We have to date received 100 residents' feedback forms on this issue. 89 support the option of extending the Green Belt. 2 support the anti-coalescence policy, 3 supported either extending the Green Belt and/or the anti-coalescence policy and 6 support no change.

43.2 WMPC has been faced with three Appeals on Green Belt land in support of TMBC. We submitted Proof of Evidence from Kevin Goodwin setting out the ways in which extending the Green Belt boundary would meet the special circumstances required. See section 2 for the relevant paragraphs.

43.3 Option three will result in the further erosion of the countryside which separates West Malling from Kings Hill, East Malling, Larkfield and Leybourne, and these communities from one another.

- 43.4 Option two is an unknown policy which we have previously been advised is no longer allowed. As a result the strategic gap between Maidstone and Malling has been largely lost. It does not have the well known and enduring credibility, status and functions of the Green Belt ie. to prevent urban sprawl, protect historic towns, and preserve the openness of the countryside in the long term.
- 43.5 Option one has been supported by this Parish Council since the 1990's and we were extremely pleased to received TMBC support for the first time in the last iteration of the Local Plan.
- 43.6 In recent years the rural setting of West Malling has threatened by applications near to the station. It has been lessened by permissions for around 150 dwellings granted on King Hill, and the loss of Forty Acres to the east of the bypass. It is further threatened by the unresolved applications at the A20/A228 junction, and Broadwater Farm. All these lie within the unprotected eastern side of West Malling. The need for the extension of the Green Belt to encircle West Malling to protect its rural setting is both urgent and important.
- 44. Do you agree that the Local Plan should set requirements for a certain proportion of development on major sites to be built using MMC?**
- 44.1 Yes. It would be helpful if TMBC set a target for the use of MMC. It is important to benefit from the reduction in carbon emissions achieved over the lifetime of the building through Modern Methods of Construction, with associated reduction in waste and greater potential for recycling materials.
- 44.2 Any construction should also incorporate the advantages of passive design (ie design that works with the local climate to maintain a comfortable temperature in the home. It achieves this by using free, renewable sources of energy such as sun and wind to provide household heating, cooling, ventilation and lighting, thereby reducing or removing the need for mechanical heating or cooling).
- 44.3 Such buildings should also include features to improve habitat for eg migrant birds or wild bees, eg. Ponds, insect 'bricks' or hotels, and nesting boxes.
- 45. Do you agree that the Local Plan should set a minimum requirement for tree canopy coverage on new developments?**
- 45.1 Yes. Trees provide a win-win option; they act as a long-term carbon sink and at the same time contribute to mitigating the effects of climate change for residents by temperature reduction, improved air quality, increased biodiversity and an overall enhancement of wellbeing. Trees also protect against flash flooding which is predicted to be more frequent and more severe.
- 45.2 Hedgerows and verges, agricultural land, grazing and meadows also act as carbon sinks and habitat and should be valued accordingly.
- 46. Do you agree that the new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds?**
- 46.1 Yes. New developments should be required to include a range of habitat space for wildlife, including bee bricks, places for nesting birds and other wildlife encouragement measures. The creation of ponds can also contribute to local flood management as well as providing habitat for biodiversity.

47. Which climate change measures are most important to you?

47.1 WMPC would prioritise:

- (a) Energy efficient, future-proofed buildings;
- (b) Habitat creation – natural (e.g. meadows, hedgerows); and
- (c) Multi-functional green infrastructure (recreation, carbon sinks and biodiversity net gain).

48. What are your reasons for selecting these particular climate change measures as priorities for the Local Plan?

48.1 West Malling is principally an urban centre in a rural landscape. These priorities are chosen to reflect our needs rather than those of the wider borough. The chosen priorities provide a positive contribution to reducing carbon emissions as well as contributing to mitigating and adapting to climate change by increasing habitat for enhancing biodiversity and providing increased access to the natural world with associated benefits for wellbeing and quality of life.

48.2 Our first priority is for energy efficient, future-proofed buildings. This seems fundamental to achieving National, County and Local targets for achieving net zero carbon emissions by 2050. We would hope to see MMC, passive design and habitat creation all included in the standards set for future development

48.3 Our second is for habitat creation – natural (e.g. meadows, hedgerows). Meadows and Hedgerows are easier to achieve in West Malling and the surrounding agricultural land than new woodland. Increasing hedgerows and upgrading existing grassland will offer a comparable carbon sink, with improved habitat for biodiversity, alongside improved air quality and the associated health benefits, and enhanced quality of life. Of course, we would like to support increasing the tree canopy and optimising opportunities for improving habitat for biodiversity.

48.4 Our third priority is multi-functional green infrastructure (recreation, carbon sinks and biodiversity net gain). Maximising the potential of urban centres to contribute to reducing carbon emissions and boosting quality of life and health should be a priority, e.g. through increased use of photo voltaic tiles, green roofs, creating cycle paths and traffic calming, alongside pedestrianised areas with more street trees. Better co-ordinated, cheap public transport using clean energy. Increased sports facilities with playing fields acting as carbon sinks and infrastructure to encourage users to access them on foot or cycling or public transport.

49. Which local policy requirements are most important to you?

49.1 WMPC would prioritise biodiversity and ecology; public open space; social housing or equivalent for purchase or rent; and housing adapted for climate change, i.e. insulation, energy and water efficiency, solar panels, ground source heating, electric charging points, sustainable drainage.

50. What are your reasons for selecting these particularly local requirements as priorities for the Local Plan?

50.1 WMPC believes that the policies with the highest priority should be those which contribute to stabilising and reversing global heating and providing accommodation for low-income families.

50.2 Social Housing or an equivalent product is necessary for lower income families who are priced out of the market by demand and higher wages driven by the London Market.