

PART 3 - Comments on specific sites in or adjacent to the Parish

West Malling car parks – 59488 and 59447

West Malling Parish Council OPPOSES development on these sites on the basis that:

- The loss of the car parks will have a direct, negative impact on the town's shops, hospitality and business premises, as well as the popular **farmers market**, which all depends on car parking both for customers and stallholders.
- Many businesses have no on-site parking provision owing to the age of their often-listed premises.
- There are no alternative sites as conveniently located for the town centre.
- Restricted parking availability may have an impact on **visitor numbers** to the town, to the detriment of local businesses.
- Car parks in the town are all within the Conservation Area and therefore **adjacent to important heritage assets**, given the way they are woven into the fabric of the town.
- Development for housing above the car parks would significantly damage the outstanding architecture which the Conservation Area was created to protect.
- In the case of Tesco Car Park [site 59447], its proximity to St Mary's Abbey is likely to cause significant harm to this Scheduled Ancient Monument and impact the way of life of those who call it home. The rare Ancient House (Grade 1 listed) also backs onto this car park.
- The Tesco Car Park is subject to a 75-year restrictive agreement with Whitbread Fremlin regarding permission to cross their land to access parking.
- In the case of the Ryarsh Lane car park [59488] damage is likely to occur to numerous heritage assets, including Malling House and a number of grade 2 listed buildings in its vicinity on Town Hill, the High Street and Ryarsh Lane itself.
- There have been reports from local residents of **bats** on the car park site.
- Closure of the car park would have a detrimental **impact on surrounding residential roads** where parking restrictions are not in place. Importantly, this may cause access problems for emergency services, particularly in a number of narrower residential roads just off the High Street.
- Closure of the car park would be likely to have a significant **impact on the ability of people from protected groups when accessing the town**. Removing designated car parks would in particular make visiting West Malling more difficult for less able people.

Sites around the railway station and Eden Farm – 59854, 59860, 59807 and 59814

West Malling Parish Council OPPOSES development on these sites on the basis that:

All sites are outside the confines of the built up area of West Malling and are therefore countryside, and form part of the rural setting of West Malling and the entrance to the Conservation Area..

- 59807 and 59860 are sites refused on Appeal due to the effect on the setting of **St Mary's Abbey** causing significant harm to this Scheduled Ancient Monument, West Malling's most treasured heritage asset, as well as the way of life of the Abbey's community. The potential impact on the Abbey as a heritage asset and on the tranquillity of the community were central arguments upheld by the Inspector during the recent appeal against development on this and other nearby sites. 59814 is adjacent to these two sites.

- The sites' **proximity to the listed Eden Farm Oasts** will cause significant damage to these important heritage assets, that are the first sight of the town when arriving at the railway station.
- **Drainage** is an issue on the 59854 Lucks Hill site, both during wetter seasons when flooding occurs in the fields and on nearby roads and into the Primary School premises, and during the summer when stagnant water sits in the corner of the field near the railway bridge.
- Residential development on these sites would increase the number of vehicles using **Swan Street**, a road which is already at capacity at busy times and which has a dangerous, narrow bend with limited visibility.
- The sites' **proximity to the nearby Primary School, Nursery, Church and holiday accommodation** is cause for concern, with increased vehicle movements along Swan Street and Lucks Hill posing significant risk to parents and their children, particularly at the start and end of the school day.
- There have been reports from local residents of **bats** on the car park site.

Sites along Norman Road – 59619, 59620, 59621 and 59622

West Malling Parish Council OPPOSES development on these sites on the basis that:

- Construction on this site would be on designated **Green Belt** and outside the town confines, and would not meet the exceptional circumstances require to justify. Development would do nothing to preserve, contribute to, or enhance the rural character of the area as required by Para 174 of the National Planning Policy Framework (NPPF). The Green Belt exists to preserve the openness of the countryside, prevent the urban sprawl of West Malling and coalescence with nearby settlements in East Malling and Kings Hill and protect the heritage assets of the town.
- **Numerous planning applications for residential and commercial development of part of this site fronting Norman Road have been rejected**, on the basis that it sits on Green Belt land on reflecting CP14 concerning countryside development in the TMBC Core Strategy (2007).
- Development on this site would cause **additional traffic risk and congestion**, with vehicles having to access the site either from:
 - Fartherwell Road, an attractive, single track, designated Quiet Lane which is prone to flooding;
 - Sandy Lane, another single-track road with passing places and a height limit under the railway bridge, which also suffers from high levels of surface runoff and drainage issues;
 - The High Street, via West Street, the latter of which features a single-track passing point, flanked by listed structures which represent some of the most ancient buildings in the town.
- The site's **proximity to the listed cottages at Norman Place**, which once made up the outlying community of New Town, will cause significant harm to these heritage assets.
- The site itself, along with Norman Road, is **susceptible to regular flooding** during the wetter months which is likely to be exacerbated by additional development and any associated surface runoff.

Sites to the south of Offham Road - 59714 and 59645

West Malling Parish Council OPPOSES development on these sites on the basis that:

- Construction on this site would be on designated **Green Belt** and would not meet the exceptional circumstances require to justify. Development would do nothing to preserve, contribute to, or enhance the rural character of the area as required by Para 174 of the National Planning Policy Framework (NPPF). The Green Belt exists to preserve the openness of the countryside, prevent the urban sprawl of West Malling and coalescence with nearby settlements in East Malling and Kings Hill and protect the heritage assets of the town.
- This site is **outside the confines of West Malling** and is therefore designated as countryside. Any development on this site would be dependent on car use given its location outside the confines of the town and at a significant distance from the High Street and town centre.
- Development on this site would cause **additional traffic risk and congestion**, with vehicles having to access the site from the High Street, via West Street, the latter of which features a single-track passing point, flanked by listed structures which represent some of the most ancient buildings in the town.
- **West Malling CoE Primary School** lies immediately to the west of the nearby Offham Road/ Norman Road junction. A nursery school and a Speech and Language unit also exist on site, resulting in very young, and vulnerable children being present in and around this junction at school start and end times, when heavy congestion already backs up into Offham Road and the High Street.
- The site's **proximity to listed structures on Churchfields and to St Mary's Church** is likely to cause significant damage to these unique heritage assets.
- **On-street parking** along Offham Road is likely to contribute to the heightened risk that increased vehicle movements will cause at the edge of this proposed development.

Site between Offham Road and Ewell Avenue – 59699

West Malling Parish Council OPPOSES development on these sites on the basis that:

- Construction on this site would be on designated **Green Belt** and would not meet the exceptional circumstances require to justify. Specifically, 'limited infilling' was ruled out by Inspectors. Development would do nothing to preserve, contribute to, or enhance the rural character of the area as required by Para 174 of the National Planning Policy Framework (NPPF). The Green Belt exists to preserve the openness of the countryside, prevent the urban sprawl of West Malling and coalescence with nearby settlements in East Malling and Kings Hill and protect the heritage assets of the town.
- The site is formed of Grade 1 of the **Best and Most Versatile Soils** and is currently intensively used for agriculture, growing salad and grain crops for national distribution.
- This site is **outside the confines of West Malling** and is therefore designated as countryside. Any development on this site would be dependent on car use given its location outside the confines of the town and at a significant distance from the High Street and town centre.
- The fields are crossed and bounded by a number of **popular walking routes** linking to the High Street and Country Park facilities in West Malling, and the pub and Spadework facilities in Offham.

- Development on this site would cause **additional traffic risk and congestion**, with vehicles having to access the site either from:
 - Fartherwell Road, an attractive, single track, designated Quiet Lane which is prone to flooding;
 - Sandy Lane, another single-track road with passing places and a height limit under the railway bridge, which also suffers from high levels of surface runoff and rainage issues;
 - The High Street, via West Street, the latter of which features a single-track passing point, flanked by listed structures which represent some of the most ancient buildings in the town.
- **West Malling CoE Primary School** lies immediately to the west of the nearby Offham Road/ Norman Road junction. A nursery school and a Speech and Language unit also exist on site, resulting in very young, and vulnerable children being present in and around this junction at school start and end times, when heavy congestion already backs up into Offham Road and the High Street.
- Development on this site is likely to have a **harmful impact on the nearby settlement of Offham**, as the number of vehicles using Teston Road to access the A20 or to head west increases.
- Local residents have reported that the site is a haven of biodiversity and have submitted reports of **skylarks** nesting at this site.
- The site is subject to **flooding** in the wetter months, particularly along its western boundary. This is likely to be exacerbated by the increased surface runoff associated with this development.

Sites off London Road – 59672 and 59658

While noting that the developments proposed at this stage of the draft Local Plan are potentially preferable to planning permission already granted for a 79-unit residential facility and significant preferable to the anticipated intensified proposals for a 120-unit residential facility, West Malling Parish Council OPPOSES the proposed level of development on these sites on the basis that:

- Construction on this site would be on designated **Green Belt** and would not meet the exceptional circumstances require to justify. Development would do nothing to preserve, contribute to, or enhance the rural character of the area as required by Para 174 of the National Planning Policy Framework (NPPF). The Green Belt exists to preserve the openness of the countryside, prevent the urban sprawl of West Malling and coalescence with nearby settlements in East Malling and Kings Hill and protect the heritage assets of the town.
- Development on this site would be **accessed by a very narrow access** road running between two properties to the A20/London Road. The size of this access road is unsuitable for all but the smallest development proposals.
- Creating an **access road from the A20** would require the construction of a small junction on this busy stretch of the A20 in order to allow for safe access from both directions onto the site.
- The site is **close to housing in Brickfields and Yates Gardens** which are typically rural in character. The addition of 17 or 19 houses would be detrimental to that character.
- Development on this site would risk **nesting wildlife** and have a harmful impact on biodiversity, as highlighted in previous applications for the site.

Site stretching from Offham Road to Malling Place – 59716

West Malling Parish Council OPPOSES development on these sites on the basis that:

- Construction on this site would be on designated **Green Belt** and would not meet the exceptional circumstances require to justify. Development would do nothing to preserve, contribute to, or enhance the rural character of the area as required by Para 174 of the National Planning Policy Framework (NPPF). The Green Belt exists to preserve the openness of the countryside, prevent the urban sprawl of West Malling and coalescence with nearby settlements in East Malling and Kings Hill and protect the heritage assets of the town.
- This site is **outside the confines of West Malling** and is therefore designated as countryside. Any development on this site would be dependent on car use given its location outside the confines of the town and at a significant distance from the High Street and town centre. The site is bounded on all sides by open farmland, apart from a few residential properties lining the entrance to Manor Farm, which were adapted from former agricultural buildings, including farm, oast houses and hopping huts.
- Development on this site from Offham Road would cause **additional traffic risk** and congestion, with vehicles having to access the site either from:
 - Fartherwell Road, an attractive, single track, designated Quiet Lane which is prone to flooding;
 - Sandy Lane, another single-track road with passing places and a height limit under the railway bridge, which also suffers from high levels of surface runoff and drainage issues;
 - The High Street, via West Street, the latter of which features a single-track passing point, flanked by listed structures which represent some of the most ancient buildings in the town.
- Development on this site is likely to negatively affect the view of the Scheduled Ancient Monument **St Leonard's Tower** from the Northwest – a treasured symbol of the town for many local residents, and the setting of the listed Malling Place.

Sites along St Leonard's Street – 59594 and 59603

West Malling Parish Council OPPOSES development on these sites on the basis that:

- Construction on this site would be on designated **Green Belt** and would not meet the exceptional circumstances require to justify. Development would do nothing to preserve, contribute to, or enhance the rural character of the area as required by Para 174 of the National Planning Policy Framework (NPPF). The Green Belt exists to preserve the openness of the countryside, prevent the urban sprawl of West Malling and coalescence with nearby settlements in East Malling and Kings Hill and protect the heritage assets of the town.
- The site is ~~in an~~ adjacent to the **West Malling Conservation Area**. Development of this site would be detrimental to the setting of the Conservation Area, and especially to the Grade II* listed building of St. Leonard's tower and of Malling Place, as well as two exceptional Kent Wealden Hall houses in the near vicinity.
- This area forms the setting for **St Leonard's Tower** which is believed to be one of the most complete Norman Keep towers in the country. The tower is owned and maintained by English Heritage, provided with interpretation panels and is regularly visited especially when openings are permitted.

- The site is formed of Grade 1 of the **Best and Most Versatile Soils** and is currently intensively used for agriculture. It is also used for grazing horses and is part of an established stabling business.
- This site is **outside the confines of West Malling** and is therefore designated as countryside. Any development on this site would be dependent on car use given its location outside the confines of the town and at a significant distance from the High Street and town centre. This proposal would exacerbate continued ribbon development along St Leonard's Street, creating more distant development with little connection to the town
- St Leonard's St is a **notorious black spot for crashes** resulting from excess speed. Current speed restrictions move from 40mph to 30mph, but evidence suggests that these limits are regularly contravened. Development on this site would add vehicle movements and risk to this already dangerous stretch of road.
- The southern tip of this site was formerly occupied by a toll house entrance to West Malling, and currently forms a small green which WMPC has established has unknown ownership. WMPC is including this green within our **list of proposed Green Spaces** because of its history and as the site for our village sign, bus stop and floral planting.

Broadwater Farm development – 59740

West Malling Parish Council OPPOSES development on this site, and generally supports the arguments of Broadwater Action Group. For our own parish we would add

- Development on this site would **erode the green boundary between West Malling, East Malling and Kings Hill**, merging these two highly distinct settlements. This should be mitigated with an extension of the Green Belt between West Malling and East Malling.
- This development site goes considerably further to the north than the site put forward in the previous Call for Sites, and the lengthy spine road possibly prepares the ground for yet higher numbers of houses in the future. Further expansion would merge West Malling, Kings Hill and East Malling. WMPC takes the view that confining any development to a line south of Pikey Lane would decrease the visual impact in the beautiful landscape of this area.
- This proposal overlaps with the **New Barns Conservation Area** and is likely to cause highly significant damage to the numerous heritage assets in the vicinity, as well as this highly attractive area of heritage farmland.
- Development would result in the loss of productive farmland.
- This proposal would irreparably **damage ancient woodland**, with which would be lost several species of interest, including badgers, dormice and other assorted wildlife.

Nov 2022

For further information, please contact Claire Christmas at clerk@westmallingspc.org.