



**West Malling**  
Parish Council

## West Malling Parish Council

# Response to TMBC Regulation 18 Local Plan Consultation 2025

## Vision and Objectives

### 1 Do you agree with the Local Plan overall vision?

Agree

#### **Tell us more about why you gave this answer.**

The vision set out in the Local Plan aligns with the priorities and concerns of local residents in West Malling. It is particularly welcome to see climate and heritage objectives, designed to protect and enhance our surroundings, balanced off with the need for new homes and necessary infrastructure developments.

If this vision can be successfully executed, residents can expect to live in a borough which is safeguarding its natural and heritage assets, while at the same time ensuring the development we need for economic growth and suitable housing supply.

### 2 Do you agree with the Local Plan objectives?

Agree

#### **Tell us more about why you gave this answer.**

The Local Plan objectives feel strongly aligned to the overarching vision set out above.

We are pleased to see the focus on climate change in Objective 1; something WMPC has long championed and made central to our role in the community. This objective is contingent on a number of the others being met, including 2, 3, 5 and 7 in particular.

As representatives of a historic market town, set in rural countryside, Objective 2 is essential to the future success of West Malling and wellbeing of its residents. Particular emphasis should be placed on how Objective 2 is balanced with Objective 3.

Objective 3 is mandated by HM Government, and required to provide suitable homes for the increasing population in the South East. Particular emphasis should be placed on the quality and range of homes, using local, sustainable materials where possible, ensuring that they are equipped to be as 'green' as possible, and offering homes of different sizes and types to suit differing needs.

Objective 6 will help ensure West Malling remains an attractive place to live, work, shop and do business. The crossover with Objective 7 on sustainable transport and physical transport infrastructure is critical, ensuring people can reach the High Street and removing artificial barriers to footfall – including punitive parking restrictions.

Objective 7 will be important if a medieval market town is to be able to cope with additional traffic from developments nearby. Thought should be given to additional sustainable public transport options connecting West Malling with Kings Hill, Leybourne and with its own train station.

- 3 On a scale of 1 to 10, where 1 is not at all satisfied, and 10 is very satisfied: Overall, how satisfied are you with the vision and objectives for the Local Plan?**

7

### **Spatial Strategy**

- 4 Do you agree with Policy SP1 Spatial Strategy?**

Neutral

**Tell us why you agree or disagree about Policy SP1?**

While generally agreeing with SP1, we think the use of a Green Gap to North of Kings Hill does not provide sufficient protection. We would prefer this to be added to Green Belt provision.

- 5 Do you agree with the spatial distribution for future growth in the borough provided at table 5.2?**

Neutral

**Tell us why you agree or disagree**

We generally agree but do not support housing development of Broadwater Farm to the East of West Malling. Broadwater Farm site development of 900 homes, while mostly outside the Parish of West Malling closely adjoins our Parish and will effectively represent a major increase in the local population as well as representing a major impact on West Malling as a defined rural town. Its impact on traffic, parking and access to local services, particularly health care, is not sustainable.

- 6 Do you agree with the settlement hierarchy in table 5.6?**

Agree

**Tell us why you agree or disagree.**

Seems a good representation of settlements.

- 7 Do you agree with Policy SP3: Settlement hierarchy and general development principles?**

Yes.

**Tell us why you agree or disagree.**

Seems reasonable to create housing where there is access to services, as long as this does not destroy natural boundaries between towns/villages.

- 8 Do you have any comments on the Sustainable Settlement Study?**

No

**What comments do you have? Please state the section or paragraph number of the report that you have comments on and / or which settlement your comments relate to.**

**9 Do you agree with Policy SP5: Future Employment Growth?**

Agree

**Tell us why you agree or disagree**

Seems a sensible strategy.

**10 Do you agree with Policy SP7: Green Belt?**

Neutral

**Tell us why you agree or disagree**

West Malling PC and East Malling PC have submitted a petition to extend the Green Belt to the East of West Malling. We note that such extensions are to be subject to further consideration before Reg 19 and West Malling PC would welcome any further considerations along those lines.

**11 Do you agree with SP8 Managing Development in the Green Belt?**

Disagree

**Tell us why you agree or disagree.**

While we welcome the proposal that such housing development contains 50% affordable housing, we are greatly concerned that at this % such homes would remain unaffordable by those in housing need. We prefer to see a reasonable % of homes let at social rent levels. We also wish to see such homes being 1-3 bed rather than the 4-5 bed homes that have largely been what developers seem to want to build in our Parish.

**12 Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary?**

Disagree

**Tell us why you agree or disagree**

The Green Gap idea is too poorly defined to give sufficient protection from development. We would much prefer this land be given full Green Belt status.

**13 Is there anything you think is missing from our Spatial Strategy policies?**

Yes

**If yes, please tell us what you think is missing.**

Any reference to housing let at Social Rent levels.

- 14 On a scale of 1 to 10, where 1 is not at all satisfied and 10 is very satisfied: Overall, how satisfied are you with the Spatial Strategy policies?**

7

## **Climate Change**

- 15 Do you agree with Policy CC1: Addressing Climate Change**

Strongly agree

**Tell us why you agree or disagree with the policy**

This Local Plan affirms the Borough's commitment to take action to fulfil the legally binding national target of net zero greenhouse gas emissions by 2050. In their Climate Declaration, TMBC aspire to become a carbon neutral Borough by 2030.

Policy CC1 is a strategic policy setting out Tonbridge and Malling Borough Council's commitment to tackling the causes and impacts of Climate Change and achieving sustainable development. The policy is comprehensive and laudable. Climate change is put at the heart of planning for land use and development, proposing a proactive and best practice approach to reducing greenhouse gases and maximising measures to adapt to climate change.

West Malling Parish Council warmly welcomes this aspect of the Local Plan.

- 16 Do you agree with policy CC2 The Circular Economy?**

Agree

**Tell us why you agree or disagree with the policy.**

Policy CC2 sets out a model of a circular economy based on responsible resource management, particularly with regard to the construction industry which is responsible for significant carbon use and waste and uses natural resources extravagantly. This is a common-sense policy centred around repair and recycling, and re-frames the model of a 'throwaway' economy. The principles laid out for planning decisions are sensible and offer a sustainable route to reducing embodied carbon and reducing landfill waste to net zero.

The emphasis on re-use of land as well as building materials, prioritising 'brownfield' sites for development, is welcome. However, there should always be a full environmental assessment. Some brownfield sites are more biodiverse than agricultural land, and some sites act as an important corridor for nature.

By encouraging the use of recycled materials and innovation in construction this policy has the potential to encourage new techniques and skills which may benefit local employment. In West Malling there is an urgent need for planners to acknowledge the need for older houses, and especially listed buildings to be retrofitted to achieve energy efficiency eg appropriate glazing and solar panels.

There is nothing to disagree with in this policy, but it seems aspirational rather than practical. The Energy and Climate Statement required of developers does not seem to set targets or minimum standards. To ensure the policy achieves real change it will be important to provide clear guidance and robust monitoring.

## **17 Policy CC3 Sustainable Design and Construction**

### **Do you agree with Policy CC3?**

Agree

### **Tell us why you agree or disagree with the policy.**

Policy CC3 aligns with the objectives of Policy CC1 Addressing Climate Change and dovetails with CC2 The Circular Economy. The policy is welcome because it sets much higher standards for design and construction than are currently in use.

Policy CC3 promotes design for sustainability and minimises the impact of development on the climate and the natural environment. CC3 takes a 'whole life cycle' approach to all developments, promoting energy efficiency, responsible sourcing of materials and waste reduction from the planning stage to the 'end of life'/ demolition stage.

The requirement for developers to produce a Whole Life Carbon Assessment (WLCA) is welcome because the methodology of these assessments is regulated and comprehensive, taking account of operational carbon and embodied carbon over the lifespan of a building. All buildings must demonstrate efficient use of energy and water, as well as regulating internal air quality.

## **18 Do you agree with Policy CC4 Energy and Heating?**

Agree

### **Tell us why you agree or disagree with this policy**

Heating and powering buildings account for 28% of TMBC's carbon emissions: reducing these emissions is crucial to achieving net zero greenhouse gas emissions by 2050 and the Borough's ambition to reach net zero by 2030. West Malling Parish Council strongly supports these goals and welcomes Policy CC4.

The policy requires all new development to reduce energy demand, use energy efficiently, generate and store renewable energy and monitor energy use. The minimum standard is that buildings should be highly energy efficient and ready for a net zero future minimising the need for future modifications when the grid decarbonises. This will help to future proof development and ensure they are resilient to changing energy demands.

Again, the use of objective measurements and outcomes is very welcome (Greater than 3-star standard for the Home Quality Mark or for other buildings commercial BREEAM Very Good or higher).

A high percentage of the Borough's housing stock consists of older buildings. In West Malling, more than 100 are 'listed' for special architectural or historic interest. If we are to reduce greenhouse gas emissions to net zero, TMBC planning should provide guidelines to help homeowners retrofit their houses appropriately and efficiently.

## **19 Policy CC5 Renewable and Low Carbon Energy and Heat Projects**

### **Do you agree with Policy CC5?**

Strongly agree

### **Tell us why you agree or disagree with the policy.**

West Malling Parish Council fully supports the advancement of renewable energy and low carbon schemes but notes that renewable energy requirements do not override environmental protection and is cautious about the concept of solar and wind farms within the Borough.

West Malling Parish Council will resist plans to put large numbers of solar panels or wind turbines on high grade agricultural land, especially within the Green Belt. Such land is essential for food production when farming is threatened by an unpredictable weather pattern caused by climate change. National food security should be considered.

The population of Tonbridge and Malling has increased by 9.4% since 2011 and there has been significant year on year development in the Borough, which makes preservation of the Green Belt more important to residents than ever. Smaller, and locally appropriate renewable energy schemes would seem better suited to safeguarding the natural environment and preserving amenities.

This policy does not look, for example at the potential for solar energy on roofs over car parks, on all public buildings and industrial units; nor does it propose schemes using economy of scale to encourage existing homeowners and landlords to install solar panels and batteries.

Air and ground source heat pumps are commonly used for heating in many European countries, including for community energy projects. This technology should be given greater attention.

## **20 Policy CC6 Water Efficiency**

### **Do you agree with this policy?**

Agree

### **Tell us why you agree or disagree with this policy.**

The Environment Agency classify Tonbridge and Malling as an area of 'serious water scarcity'. Water is a finite resource and climate change is having a negative impact on its quality and quantity. Policy CC6 aims to reduce individual water consumption in New Build Residential Development to 110 litres per

person. West Malling Parish Council recognises the need to save water and supports the policy.

Policy CC6 will achieve this reduction in water use by harvesting rainwater and re-using grey water for e.g. flushing toilets, and watering gardens, reserving potable 'mains' water for drinking, washing etc.

The policy requires water usage to be measured, providing clear outcome measures.

## **21 Policy CC7 Managing Development within Flood Risk Areas.**

**Do you agree with the policy?**

Neutral

**Tell us why you agree or disagree with the policy.**

There is ongoing work to understand the flood risks within the Borough fully. Until this is complete it is hard to judge. The measures suggested to mitigate the risks, and the effects of flooding appear sensible, but given the instability of climate change and the unpredictability of the weather, building in an area prone to flooding seems unwise.

This policy has little relevance for West Malling which is a low flood risk area. The problems that do occur with flooding relate to poorly maintained infrastructure.

Nature-based solutions, such as tree planting in areas at risk, can also mitigate against climate change, as well as helping to absorb rainwater and enhancing biodiversity.

## **22 Policy CC8 Sustainable Drainage Systems.**

**Do you agree with the policy?**

Agree

**Tell us why you agree or disagree with the policy.**

Despite water scarcity, a 10% increase in rainfall is predicted for Tonbridge and Malling by 2042, and rainfall is likely to be extremely heavy at times. Managing surface water to efficiently reduce run off surface water is essential for any new development. New development should not contribute to increased surface water.

Sustainable drainage systems (SuDS) are intended to remain effective in the event of a climate adjusted 1:100 years storm. Since the existing water and drainage systems would be overwhelmed, SuDS must be able to detain and retain water where it falls, using nature-based solutions relying on water soaking into the ground and then following a natural course. Tree planting, green roofs, rain gardens and swales provide health benefits for people, shade in hot weather, and enhance biodiversity.

The policy requires developers to provide long term maintenance of SuDS.

It would be helpful if there were regulations dictating the kind of permeable hard surface that should be laid down when people replace garden space with parking.

**23 Is there anything you think is missing from our climate change policies?**

**If yes, please tell us what you think is missing**

Requiring developers to calculate their whole carbon usage, not just by the land, but also the materials, then to offset these emissions by carbon sequestration with tree planting and creating meadows. Wildflower meadows can sequester up to 3 tonnes of carbon per hectare annually, while grass meadows are exceptionally efficient at capturing carbon, making them crucial for climate change mitigation.

**24 On a scale of 1 to 10, where 1 is not at all satisfied and 10 is very satisfied: Overall, how satisfied are you with the climate change policies.**

8

**25 Do you think these policies will help the borough transition to net zero by 2025 and adapt to climate risks?**

Yes

**Please explain your answer**

Ensuring everyone is working from these policies is, at least, a start.

## **Natural environment**

**26 Do you agree with Policy NE1: Conserving and enhancing the natural environment?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees wholeheartedly with enhancing the natural environment in our parish and those of the Borough. The natural environment is a vital part of the whole ecosystem. Its importance has been denigrated over many years and here is an opportunity to bring real change and improvements. The impact to our residents can only be beneficial to their quality of life by providing protection for trees, hedgerow, soil conditions and many areas for wildlife to thrive. Sequestering carbon and helping mitigate the harmful effects of pollution are just one important reason that all trees, woodlands and hedgerow need conserving and enhancing.

**27 Do you agree with Policy NE2: National Landscapes?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees with the NE2 policy of protecting Kent Down's and High Weald as National Landscapes where developments are limited and conserving the landscape is given greater importance.

**28 Do you agree with Policy NE3: Landscape Character?**

Agree

**Tell us why you agree or disagree.**

The fact that the Borough has four distinct character areas is indeed an asset and West Malling Parish Council agrees with the NE3 policy. Under policy 3 which states that 'developments proposals will be expected to demonstrate ...' we would like to replace the word 'expected' to 'must'.

**29 Do you agree with Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species?**

Agree

**Tell us why you agree or disagree**

This is a comprehensive plan and one which West Malling Parish Council agrees with the implementation.

**30 Do you agree with Policy NE5: Biodiversity Net Gain?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees with policy NE5 but has concerns over the wording '... aims to leave the natural environment in a measurably better state ...' Important consideration needs to be given to enforcing and qualifying the stated objectives.

We would also like to see an easier method for delivering on-site BNG including a second level of including nearby possibilities before going off-site further afield.

**31 Do you think there's a case for requiring Biodiversity Net Gain greater than 10%?**

Yes

**Please explain your answer.**

Yes, West Malling Parish Council does think there is a strong case for going beyond 10%. Over many years the overall quality and quantity of biodiversity in our borough, and nationally, has been in serious decline. Any percentage increase for improvement will be beneficial for nature and help redress the balance for the denigrated environment over many years and will help enhance the borough for future generations.

**32 Do you agree with Policy NE6: Green and Blue Infrastructure?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council welcomes the NE6 policy because it links the essential elements - a healthy environment for healthy residents. It brings together a small, local and recognisable policy. These urban / parish features are what, on a day-to-day bases, make the most difference to those living in the area. From a particular tree to allotments from a quiet lane to an old wall. We would like to see a policy that ensures any 'opportunities' incorporated into developer plans must have ongoing oversight from a TMBC environmental protection / enforcement officer.

**33 Do you agree with Policy NE7: Woodland, trees and hedgerows?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council was delighted to see hedgerows being given the same importance as trees for this policy which we fully support. We are pleased that the beneficial effects of having tree lined streets was included and particularly the cooling this brings. Continuing maintenance of any planting is key there are estimates suggesting 30% to 70% of new trees die within the first few years due to poor maintenance, drought, improper planting (e.g., deep root collars), mower damage, and lack of watering. Under Policy Implementation 7.90 could hedges be added to the protection offered?

**34 Do you have any comments on the council's Local Belt Space Methodology?**

Neutral

**If yes, do you have any comments?**

The methodology seems reasonable, but it is all down to interpretation.

**35 Do you have any comments or wish to submit evidence on the Local Green Spaces that listed in Annex 3? If yes, please tell us which site your comments relate to. (Example BG-01)**

**Upload any evidence in relation to your comments here**

- Banky Meadows which appears on the topic paper as LGS number 60106. The Council seeks clarification of the site boundary. In addition, does this site have any correlation to Site ID (LAA Site Summary) 59957 which is titled Land East of Town Hill, West Malling; this area is commonly also known as Banky Meadows.

- Land southwest of West Malling railway station, Station Approach which appears on the topic paper as LGS number 59807. The postcode is for East Malling and therefore does not correlate to the West Malling site.
- Land at corner of Lavenders Road and Swan Street, West Malling which appears on the topic paper as LGS number 59860. Please can the boundary of this site be confirmed. This site ID does not appear on the call for site document but sites 68426 and 58596 do – please can planners confirm if 59860 encompasses both 68426 and 58596.
- Land (car park) North of Ryarsh Lane and West (rear of) Davison Close, West Malling which appears on the topic paper as LGS number 59447. The Council understands that this site is currently being assessed against Criterion 5 and the Council would like to take this opportunity to reiterate that it does not believe the site is '*demonstrably special to the local community and holds particular local significance*'.

**36 Do you wish to submit a site that has not yet been submitted for consideration?**

No

**37 Do you agree with Policy NE8: Best and most versatile agricultural land?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council believes that all agricultural land should have protection and not just those smaller than the 20 hectares suggested. Food production, on even a small scale, is vital for food security and has fewer transport miles which is essential for curbing pollution and taking vehicles off our overcrowded roads.

**38 Do you agree with Policy NE9 Noise, vibration and odour Pollution.**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees with Policy NE9. Noise, vibrations and odour pollution are an insidious and underrated stress and can be very harmful to people's mental health.

**39 Do you agree with Policy NE10 Air quality?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees with Policy NE10. Air quality needs to be monitored regularly and speed restrictions from 70mph to 50mph on the M20 should be reduced if necessary to assist.

**40 Do you agree with Policy NE11: Ground Contamination?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees with Policy NE11

**41 Do you agree with Policy NE12: Light Pollution?**

Agree

**Tell us why you agree or disagree.**

West Malling Parish Council agrees with Policy NE12. Light pollution is harmful to both nature and to people's health. It is also important to safeguard against additional lighting being added after the completion of a development.

**42 Is there anything you think is missing from our Natural Environment policies?**

Yes

**If yes, please tell us what you think is missing.**

The above policies will not work unless there are safeguards. They can be included in planning documents but there needs to be assurances that they will be implemented properly. Enforcement is going to be essential. Neither warm words nor good intentions will save the environment unless the borough council can pursue, insist and act against developers when the borough's own policies are not being adhered to.

We would like the importance of orchards, meadowland and some scrublands to be acknowledged in the policy as these can be valuable lands that need protection.

**43 Overall, how satisfied are you with the Natural Environment policies?**

4

**Historic environment**

**44 Do you agree with Police HE1: The Historic Environment?**

Agree

**Tell us why you agree or disagree**

Residents support the protection of the unique historic environs of West Malling and want to see the many heritage assets and open spaces protected from unsuitable development. It is to be hoped the ideals expressed in HE1 will be upheld and not succumb to external pressure.

**45 Do you agree with Police HE2: Listed Buildings?**

Agree

**Tell us why you agree or disagree**

West Malling has 117 listings on the British Listed Buildings database, some of which are over 600 years old and give West Malling its unique character. Residents want to see this protected and supported. New homes should be of sustainable materials and as “green” as possible to maintain the historic character of the town.

**46 Do you agree with Policy HE3: Conservation Areas?**

Agree

**Tell us why you agree or disagree**

West Malling was listed as a Conservation Area in 1971 with extensions in 1990 and 1993. The town is committed to preserving this status, whilst acknowledging the need for new homes, all building must be sympathetic and appropriate.

**47 Do you agree with Policy HE4: Historic Parks and Gardens?**

Agree

**Tell us why you agree or disagree**

In an increasingly busy, urbanised world the importance of well-maintained green spaces cannot be over emphasised. It is known that mental health and wellbeing improve when these facilities are freely available.

**48 Do you agree with Policy HE5: Archaeology?**

Agree

**Tell us why you agree or disagree**

There are 25 nationally important Scheduled Monuments of archaeological significance in the Borough, including World War II remains at Kings Hill, West Malling and more discoveries are being made viz Roman excavations at East Malling. Such history shapes both the present and future, so care must be taken to preserve, protect and support such sites.

**49 Do you agree with Policy HE6: Enabling Development for Heritage Assets?**

Neutral

**Tell us why you agree or disagree**

This is a laudable policy, but how vulnerable will the Borough be to pressures from developers and to succumbing to expediency? It is to be hoped the aims will be maintained and enforced.

**50 Is there anything you think is missing from our Historic Environment policies?**

No

**If yes, please tell us what you think is missing**

**51 Overall, how satisfied are you with th4e Historic Environment policies?**

4

## **High Quality Design**

**52 Do you agree with Policy D1: Achieving High Quality Design?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council support Policy D1 because high-quality, locally responsive design is fundamental for West Malling. Residents consistently emphasise the importance of protecting the town's historic character and ensuring that any new development sits comfortably within its Conservation Area and distinctive townscape.

Policy D1 supports this by requiring development to reflect local character, scale, materials and historic context. It also promotes good street design, walkability, safe and accessible environments, and sustainable, energy efficient construction all of which align with the priorities of residents.

**53 Do you agree with Policy D2: Design Codes and Masterplans?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council supports Policy D2 because the use of design codes and masterplans will ensure new development in West Malling is high quality, well integrated and respectful of the town's distinctive character.

West Malling is preparing a Neighbourhood Plan that will include design code guidance tailored to the town, identifying specific design principles for distinct character areas, such as the historic centre, residential neighbourhoods, gateway locations, and key green spaces. Policy D2 provides a supportive framework for this approach, ensuring that local design codes will carry weight and can guide development in a way that reflects community expectations.

**54 Is there anything you think is missing from our Design policies?**

Yes

**If yes, please tell us what you think is missing**

While Policies D1–D4 provide a good overall approach to design, several important issues raised by West Malling residents are not fully reflected in the Local Plan. Strengthening policies in these areas will ensure new development respects West Malling's character and community priorities. The Neighbourhood Plan will produce detailed design codes, but borough wide policies should also recognise these needs.

1. Protection of Town Centre Fine Grain

The traditional pattern of narrow plots, small shopfronts, alleyways and varied rooflines is central to West Malling's character. Stronger policy wording is needed to protect this fine-grain structure.

2. Public Realm and Streetscape Quality

Residents want better paving, planting, lighting and coordinated signage. More specific expectations for materials and public realm design especially in the Conservation Area are required.

3. Walkability and Safe Movement

Narrow pavements, unsafe crossings and poor pedestrian links are key concerns. Policies should more clearly prioritise pedestrian first design.

4. Green Infrastructure

The community strongly supports more trees, planting and biodiversity corridors. Policies should require nature-based design and green street improvements.

5. Shopfront and High Street Design

There is a need for clearer guidance on traditional materials, signage and maintenance to protect the appearance of the historic High Street.

6. Protection of Key Views

Important local views including those to St Mary's Church and Malling Abbey should be specifically referenced and protected.

7. Parking Design Quality

Policies should discourage large parking courts and require well landscaped, discreet parking that reduces visual impact.

8. Sensitive Settlement Edges and Gateways

Development at town entrances and edges should respect landscape character; more detailed guidance would support this.

**55 Overall, how satisfied are you with the Design policies?**

West Malling Parish Council is broadly satisfied with the direction of these design policies, as they provide a strong foundation for high quality development, but the town will still require additional local design guidance through its Neighbourhood Plan to fully reflect its distinctive character and community priorities.

## Housing Needs

**56 Do you agree with Policy H1: Housing to Address Needs?**

Agree

### **Tell us why you agree or disagree**

West Malling Parish council agrees with Policy H1. It is important that new housing delivers the right mix of homes, particularly 2–3 bed properties, which align with the needs identified in the plan and reflect the profile of West Malling residents. A balanced housing mix will help support younger households, older residents looking to downsize, and those seeking affordable options, while ensuring that development remains appropriate in scale and character to West Malling's setting. Clear expectations on type, tenure and size will help prevent an oversupply of flats or very large homes that do not meet local need.

### **57 Do you agree with Policy H2: Affordable Housing**

Agree

### **Tell us why you agree or disagree**

West Malling Parish Council supports Policy H2 because West Malling has growing affordability pressures and a proportion of lower-income households who struggle to access market housing. Prioritising social rent and affordable rent is appropriate and reflects the most acute need. The requirement for integration of affordable units and indistinguishable design is particularly important in a historic and mixed community like West Malling, helping to ensure inclusive, balanced neighbourhoods.

### **58 Do you think that affordable housing should be prioritised, even if it comes at the expense of other infrastructure requirements?**

Agree

### **Tell us why you agree or disagree**

Yes, within reason, affordable housing should be a high priority because it directly addresses the most significant local housing need and supports the social sustainability of West Malling. However, this must not compromise essential infrastructure such as health services, active travel routes, or school capacity. A balanced approach is essential, ensuring both affordable homes and the infrastructure required to support them.

### **59 Do you agree with Policy H3: Build to Rent?**

Agree

### **Tell us why you agree or disagree**

West Malling Parish Council supports Policy H3 as Build-to-Rent can broaden housing choice, particularly for younger households and those who require long-term secure rental accommodation. The requirement for a minimum 20% Affordable Private Rent is welcomed. For West Malling, any scheme must be in a sustainable location, well-designed and small in scale so as not to overwhelm local character or infrastructure. The policy provides appropriate safeguards to ensure quality and affordability.

**60 Do you agree with Policy H4: Gypsy Traveller and Travelling Show people – Safeguarding Sites?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council agrees with Policy H4. Safeguarding existing lawful sites is important in meeting identified needs and reducing pressure for new sites in sensitive locations such as the landscape setting around West Malling. The policy ensures that no sites are lost without equivalent replacement and supports fair and consistent treatment of these communities.

**61 Do you agree with Policy H5: Gypsy, Traveller and Travelling Show people– Site Criteria?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council supports Policy H5. It provides clear criteria to guide proposals toward sustainable, appropriate locations with good access to services. This helps protect sensitive landscapes around West Malling especially green belt edges while ensuring fair provision. The emphasis on integration, safe access, minimal visual impact and good amenity standards is appropriate.

**62 Do you agree with Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council agrees with Policy H6. The town has an ageing population and a shortage of suitable downsizing and supported-living options. Requiring a proportion of specialist housing on larger schemes will help ensure that older residents can remain within the community. Locating specialist housing in walkable, well-connected areas aligns well with West Malling’s sustainability goals.

**63 Do you agree with Policy H7: Accessible and Adaptable Homes?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council supports Policy H7. Requiring all new homes to meet M4(2) standards and a proportion to meet M4(3) will help futureproof housing stock and avoid costly adaptations later. This aligns with local need and national guidance. West Malling’s ambition for high-quality, inclusive design is strengthened by this policy.

**64 Do you agree with Policy H8: Self and Custom Build Homes?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council agrees with Policy H8. Providing a small proportion of plots for self-/custom build increases choice and supports innovation. In West Malling, delivery should be small-scale and design-controlled to ensure compatibility with the Conservation Area and settlement character. The requirement for Design Codes for larger clusters is also appropriate and aligns with West Malling's intention to develop local design codes through the Neighbourhood Plan.

**65 Do you agree with Policy H9: Houses in Multiple Occupation?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council supports Policy H9. HMOs can meet an important housing need but do require strong management and appropriate location. Clear design, parking and amenity standards are essential to avoid harmful impacts, particularly in West Malling where streets and services are constrained.

**66 Do you agree with Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation?**

Agree

**Tell us why you agree or disagree**

West Malling Parish Council agrees with Policy H10. Extensions and annexes are common in West Malling and must be designed sensitively particularly within or near the Conservation Area. The policy provides an appropriate framework to ensure alterations respect local character, avoid overdevelopment, and support the need for multigenerational living.

**67 Is there anything you think is missing from our Housing policies?**

Yes

**If yes, please tell us what you think is missing**

Two important elements appear under-represented:

1. Stronger guidance on small-site, infill development

West Malling experiences significant pressure for infill development. Policies would benefit from clearer criteria ensuring such schemes respect:

- settlement pattern and historic fine grain
- local character and green spaces

- infrastructure capacity
2. The role of Neighbourhood Plans in refining housing mix and design

West Malling is developing a Neighbourhood Plan that will include local design codes and area-specific guidance. A clearer link to neighbourhood-led evidence would ensure that local distinctiveness is fully reflected.

## **68 Overall, how satisfied are you with the Housing policies?**

4

West Malling Parish Council is broadly satisfied with the housing policies, which are generally well-structured, evidence-based and responsive to identified needs. However, local distinctiveness particularly around design, infill development, and heritage context will need to be strengthened through the emerging Neighbourhood Plan to ensure that West Malling's specific housing challenges and character are fully addressed.

## **Rural development**

### **69 Do you agree with Policy R1: Rural Exception Sites?**

Agree

#### **Tell us why you agree or disagree**

Affordable housing in rural parishes is vital for the continued wellbeing and vitality of those communities. Key workers and local families need to be able to obtain accommodation close to their employment. It is essential that there are legal provisions in place to secure affordability in perpetuity. The provision of affordable housing in rural parishes enables villages to be sustainable and reduce pressure on larger local centres.

### **70 Do you agree with Policy R2: Housing For Rural Workers?**

Neutral

#### **Tell us why you agree or disagree**

Although we welcome the policy, much stronger legal agreements need to be put in place to prevent such housing becoming separated from the business in the future and being turned into large rural housing with no connection to the adjoining land. The requirement at 1d for the business to have been operating for a minimum of only three years is insufficient to measure the long-term viability of any business for which the housing is required and it is essential that any criteria for assessing future financial viability needs to be detailed and set out in the policy.

Planning enforcement needs to be greatly increased if the policy is to have the desired effect.

### **71 Do you agree with Policy R3: Replacement Dwellings Outside Settlement Confines?**

Strongly agree

**Tell us why you agree or disagree**

We strongly agree that any replacement development is restricted.

**72 Do you agree with Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines?**

Strongly agree

**Tell us why you agree or disagree**

The policy correctly strikes the balance of restricting development while recognising that some conversion of existing buildings would be appropriate.

**73 Do you agree with Policy R5: Residential Parks?**

Strongly agree

**Tell us why you agree or disagree**

The restriction of new residential parks to areas within settlement confines, or where small-scale extensions to existing sites can be justified is essential to preserving the generally rural nature of the borough.

**74 Do you agree with Policy R6: Employment Development Outside Existing Settlement Confines?**

Neutral

**Tell us why you agree or disagree**

Although we broadly support the policy, we believe that section 3 of R6 is unduly restrictive, and every effort should be made to ensure that development proposals for business purposes of existing buildings currently or last used for employment are supported unless clearly unsuitable.

The continued provision of business usage is preferable to its conversion into housing.

**75 Do you agree with Policy R7: Agriculture, Forestry and Horticulture?**

Strongly agree

**Tell us why you agree or disagree**

The Parish Council strongly supports all policies to promote agriculture, forestry and horticulture as part of the wider stewardship of the environment.

**76 Do you agree with Policy R8: Farm Diversification?**

Strongly agree

**Tell us why you agree or disagree**

We strongly support farm diversification to ensuring that the wider rural business community is sustainable. We recognise that farm shops should not be to the detriment of other local businesses and residents, including the number of Farmers' Markets in West Malling and beyond and welcome the policy on limiting such diversification.

**77 Do you agree with Policy R9: Sustainable Tourism and Visitor Accommodation?**

Agree

**Tell us why you agree or disagree**

Although we agree with the policy, we believe that section 1b needs to be the overriding requirement. Given the issues elsewhere in the country with self-catering accommodation destroying the vitality and viability of rural settlements, this requirement will need strong enforcement action.

**78 Do you agree with Policy R10: Equestrian Facilities in the Countryside?**

Strongly agree

**Tell us why you agree or disagree**

No comments

**79 Is there anything you think is missing from our Rural Communities policies?**

No

**If yes, please tell us what you think is missing.**

**80 Overall, how satisfied are you with the Rural Communities policies?**

Satisfied

## **Economic growth**

**81 Do you agree with Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future?**

Agree

**Tell us why you agree or disagree**

West Malling has suffered a significant decline in employment floorspace with a continued trend towards converting smaller office spaces to residential use. This has a detrimental impact on the ability of business startups and small and medium sized enterprises to find suitable and affordable office accommodation without moving away from the town.

We support a policy to protect and retain existing employment floorspace but would like to see much stronger policies against the conversion of employment floorspace to residential accommodation. This ensures that the parish remains a

viable location to both live and work, reducing commuting times and ensuring a viable business community.

**82 Do you agree with Policy E2: Strategic Employment Areas?**

Neutral

**Tell us why you agree or disagree**

Although we support the designation of Kings Hill Business Park as a strategic employment area, it must not be to the detriment of smaller business centres. Locations such as Kings Hill benefit larger enterprises, but do not cater for the vast majority of small businesses that require smaller, more contained sites. A focus on Strategic Employment Areas, without an acknowledgement of the harm they can cause to neighbouring business centres such as West Malling is damaging. We would welcome section 3b to be strengthened accordingly.

**83 Do you agree with Policy E3: Other Employment Sites, Premises and Floorspace?**

Strongly agree

**Tell us why you agree or disagree**

As set out in our response to Policy E1, West Malling has suffered significantly as a result of the changes to the GPDO and we welcome policies that protect smaller office floorspace in the town. A reduction in office accommodation does not just affect those businesses, however, and a vibrant healthy retail and entertainment offering in a town relies as much on office worker lunchtime trade as that of residents at other times.

Although the pandemic changed a number of business patterns, there is a significant hidden economy of home-based workers. The demand from them for suitable office accommodation away from the home environment is not well researched but should not be overlooked when setting policies to promote and retain smaller premises.

**84 Do you agree with Policy E4: Employment and Skills?**

Strongly agree

**Tell us why you agree or disagree**

Although we strongly agree with the proposal to require Employment and Skills Training Plans for larger developments and employers, there is a significant skills gap more generally in the economy and policies to assist smaller businesses to access this training for their employees or prospective employees is necessary to enable all businesses to contribute.

**85 Do you agree with Policy E5: Supporting the Vitality of Town, Service and Local Centres?**

Strongly agree

**Tell us why you agree or disagree**

We welcome an acknowledgement that West Malling plays a significant role within the Borough as a District Centre.

We further strongly support the policies set out to ensure that retail and entertainment uses are promoted and proposed developments retain those uses.

However, as set out in our responses to Policies E1 and E3, it is essential that service and office business accommodation is also protected to maintain a healthy customer base for retail and entertainment businesses during the working day.

**86 Do you agree with Policy E6: Primary Shopping Areas?**

[Applies only to Tonbridge]

**Tell us why you agree or disagree**

**87 Do you agree with Policy E7: Above Ground Floorspace?**

Neutral

**Tell us why you agree or disagree**

Although we welcome the policy to bring upper floors back into use, we are unable to support the conversion of such spaces to residential usage in West Malling, given the lack of suitable office accommodation for small businesses as set out in our responses to the policies elsewhere.

**88 Do you agree with Policy E8: Sequential and Local Impact Tests?**

Strongly agree

**Tell us why you agree or disagree**

We believe that it is essential that existing retail centres be maintained and promoted before any other developments are permitted.

**89 Is there anything you think is missing from our Economy and Town Centre policies?**

No

**If yes, please tell us what you think is missing.**

**90 Overall, how satisfied are you with the Economy and Town Centre policies?**

Satisfied

**Infrastructure**

**91 Do you agree with Policy INF1: Provision of Infrastructure and Services?**

Agree

**Tell us why you agree or disagree**

As noted in the Forward to the draft Plan, a key element of the Plan deals with providing the infrastructure needed to ensure local transport links and services are in place to support a growing population. WMPC believes that it is critical that necessary infrastructure is in place to support new development and the needs of the local area and supports the inclusion of Policies INF 1- 5 in the draft Plan, subject to comments below.

Policy INF.1 We note that new developments will be required to consider their impact upon the capacity of existing infrastructure and services. We would like this policy to go beyond the requirement to consider and require new developments to actively consult on the pressures already facing local infrastructure and agree the actions to be carried out to mitigate the impact of development on existing services. This is critical, as so much of our infrastructure, notably healthcare and transport, is under strain.

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 can provide community based preventative services, have seen a loss of grants from Local Authorities. West Malling's Age Concern Centre was closed following financial difficulties and later KCC disposed of the asset to a property developer.

Policy INF1.2 states that planning permission will only be granted where it can be demonstrated that there is or will be, sufficient infrastructure and services to meet the requirements arising from the proposed development.

WMPC welcomes this statement but would like to see more emphasis placed on the effective scrutiny of the long-term deliverability of infrastructure plans at the planning stage, including financial guarantees. For example, a medical centre planned at the Leybourne Chase development failed to materialise leading to increased strain on existing medical services in the local area.

We welcome the inclusion of Policy INF1.3 that new healthcare, education facilities and other services (where required) should be provided in locations that relate well to both existing and new development and should be accessible by existing or new/improved public transport services and walking, wheeling and cycling routes. This is particularly relevant in West Malling where we no longer have a GP Surgery and owing to a limited bus service, many residents find themselves having to take taxis to the GP Surgery in Kings Hill or local hospitals.

Policy INF1.4 states that development that supports or provides carbon neutral utilities schemes that contribute to helping the council meet its carbon neutral target will be supported. WMPC has an ambition to achieve net zero carbon emissions by 2030 and would like to see this Policy go further and require that all development should support or provide carbon neutral utilities schemes.

We welcome policy INF1.5 that applicants must work with commercial providers at an early stage to deliver broadband and mobile connectivity. This is a very

relevant issue for West Malling where mobile signal is generally poor, impacting homes and businesses.

Policy INF1.6 states that new or improved infrastructure and services will be delivered either on-site by developers or off-site through S106 or S278 agreements. Planning obligations will be linked to development phasing or trigger points to ensure delivery occurs when required. 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.

Policy INF1.7 states that long-term maintenance and management of infrastructure assets must also be considered. This is so important that we think that the process for long-term maintenance and management should be legally agreed, rather than merely considered. We agree that, if required, contributions towards maintenance and management should be secured.

Policies INF8 – 10 address infrastructure delivery and phasing, and we support these important policies. 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. We would like to ensure that rigorous and meaningful measures and controls are adopted to encourage early construction of necessary infrastructure and safeguard against any failure to meet this vital requirement. We urge the Council to ensure that new health infrastructure is delivered in parallel with housing growth, not after the population has increased.

We highlight the provision in INF1.9 that proposals that would compromise existing utilities infrastructure or encroach on future connections will be refused. WMPC note concern among residents concern that new development would place undue strain on the local area's existing water supply and sewage service which is already under significant pressure.

INF 1 11- 13 deal with Viability and we have some concerns about the imprecise wording within these policies. For example, Policy INF1.12 states that if the full requirement of infrastructure and services mitigation requirements is not able to be delivered due to viability then developments will only be permitted where their benefits outweigh the harm as a result of the lack of full mitigation and other relevant requirements, having regard to all material considerations. This appears to dilute a developer's infrastructure obligations, and we would like more clarity on the meaning of 'viability' and the material considerations that would be examined when assessing whether or not a development will be permitted within the scope of this policy.

The strain on healthcare is a key issue for West Malling residents and we request ongoing engagement with the local PPGs and local health providers as the Plan progresses, including at the Regulation 19 stage and during consideration of major planning applications. This will ensure that health needs are kept under review and addressed in detail. We request that the Local Plan includes a clear,

costed, and deliverable commitment to expand or provide new primary care facilities for West Malling residents, in step with housing delivery.

We request that developer contributions for health are secured and ring-fenced for local provision, that the NHS Kent and Medway Integrated Care Board is a key partner in infrastructure planning, that the Council maintains ongoing dialogue with the PPG and local health providers and that there is transparency at every stage and at every level of these developments.

**92 Do you agree with Policy INF2: Sustainable Transport and Active Travel?**

Agree

**Tell us why you agree or disagree**

We mostly support this policy and agree with the council's recognition of the importance of delivering and enhancing sustainable and active travel infrastructure which is essential to support the vitality of new and existing communities. As noted in our response to Policy INF1 above, we would like provision to be made for the effective scrutiny of the long-term deliverability of infrastructure plans such as transport at the planning stage, including financial guarantees.

WMPC notes that lack of investment in strategic infrastructure and congestion on local transport networks is a key economic development issue. The Q3 2025 UK Business Confidence Monitor states that transport problems are a continuing challenge for the Retail & Wholesale sector. It is therefore essential that the Local Plan addresses this issue.

We must recognise that the existing road network is at key times already full, and that further development will put increased pressure on these networks. The Local Plan must seek transport methods that do not rely on private use of cars and note the negative impact of a greater number of cars on parking throughout the local area.

If approved, the delivery of the Lower Thames Crossing Project will increase capacity on the M2 and M20 leading to severe mobility issues locally.

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 as well as putting further strain on the West Malling station car park which is already beyond capacity on the key working days of the week.

WMPC would encourage the prioritisation of

- Bus services – linking developments to services (particularly healthcare) and places; 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.

- Cycle routes – safe links between homes and schools, other service, places and public transport. 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.
- Pedestrian infrastructure – safe links between homes and schools, other services, places and public transport.
- Rail – improving station access and links with cycling and walking routes; and
- Roads including junction improvements.

To meet the 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 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.

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 noncarbon-based transport. Also, a focus on street lighting, reducing speeding is needed and improved quality of roads (for example, potholes deter cyclists) and pavements. 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.

WMPC would like the constraints of narrow, winding country lanes to be considered when it comes to agreeing development.

We would also like to see a policy on Quiet Lanes.

We would like to see a policy on access requirements for emergency vehicles in new developments.

**93 Do you agree with Policy H2: Affordable Housing**

Neutral

**Tell us why you agree or disagree**

The concept of Affordable Housing is problematic in the South East where housing costs, both of private rental and purchase, are very high. Thus, the overall strategy of using the 80% of market cost as a definition for affordability does not bring affordability to many who are in local housing need. WMPC strongly supports social rent as the model for affordable housing, while recognising that the ability of Registered Providers to take on such homes is

much more limited than in the past. However, this is what is needed and the Local Plan should be a beacon for the Borough in achieving genuinely affordable homes in a difficult environment. We do not agree with developers being able to reduce affordable housing levels in new developments by claiming financial constraints or by providing such housing elsewhere. Our main concern is that genuinely affordable housing locally must be enshrined in the Local Plan to meet local housing need locally. If developers are unable to deliver within stronger constraints, then the development should not proceed.

**94 Do you agree with Policy INF3: Parking?**

Agree

**Tell us why you agree or disagree**

We welcome Policy INF 3 that all new developments will be required to consider and provide adequate and well-integrated parking for all types of vehicles, taking account of KCC's Parking Standards (2025) for these or any subsequent replacement guidance.

In Policy INF3.2(e) we agree that when considering new parking provision for all types of vehicles, the applicant should consider local circumstances, including existing parking controls. We would like to see more detail in the policy about the need for an applicant to look at the impact on parking on the wider local infrastructure and not just in a particular development, due to the increased number of cars in the local area. This is particularly relevant in West Malling where difficulties in parking in the town already have a negative effect on the local economy and further development will increase the pressure on parking spaces for both residents and visitors. The long-term knock on effect on businesses, schools and churches could be profound. The Local Plan needs to protect the availability of parking and the character of the Conservation Area as essential ingredients for the viability of the town centre (see also our comments on Policy D1 on High Quality Design) - visitors to West Malling are needed to keep the town as the vibrant and attractive place it is to shop and enjoy hospitality. Free or cheaper parking would also encourage longer dwell times increasing both footfall and frequency of visit. The environmental impact of a failure to consider parking provision cannot be overstated. TMBC should be encouraging people to shop as locally as possible and if parking options within West Malling are not viable, visitors will drive to other retail destinations and increase poor air quality.

The importance of parking is also relevant for community facilities, such as medical centres, schools and country parks. For example, current parking and access issues including public transport at and near local GP practices must be addressed as part of any new development, to ensure all patients can access care safely and conveniently.

Increase in population within TMBC will put further strain on the West Malling station car park which is already beyond capacity on the key working days of the week.

Development of this Policy must also tie in with Policy INF2 on transport, as the Local Plan must seek transport methods that do not rely on the private use of cars.

We welcome that new developments should also provide electric vehicle and bike charging and would like the Local Plan to expand this provision in car parks across the local area.

**95 Do you agree with Policy INF4: Community Facilities?**

Agree

**Tell us why you agree or disagree**

We support the Plan's recognition of the need for new and improved infrastructure to accompany housing growth, and the commitment to protect and enhance community facilities (Policies INF1 and INF4).

As outlined above in relation to Policy INF, we would like to see more emphasis placed on the effective scrutiny of the long-term deliverability of infrastructure plans at the planning stage, including financial guarantees. We also have significant concerns about the adequacy and timing of health infrastructure provision, given the scale of proposed development. The Plan proposes over 900 new homes at Broadwater Farm and the Crest and further residential conversions in Kings Hill, which will substantially increase the local population. Our local medical practice is already experiencing high demand, with pressures on appointment availability, staff recruitment, and physical space. Without timely investment in expanded or new health facilities, these pressures will worsen, risking patient care and staff wellbeing.

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

An increase in residents will lead to an increase in demand for community facilities including dementia care, warm spaces, uniformed groups, youth groups and an increased demand for library services.

See also our comments on Policy INF2 (Sustainable Transport) and INF3 (above) as sustainable transport and parking are critical to the success of community facilities and must be considered together.

**96 Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision?**

Agree

**Tell us why you agree or disagree**

We support Policy INF5.1 that the Council will protect existing and support the provision of new and enhanced high quality open space, sports, and recreation

provision to ensure that residents and visitors can enjoy the benefits that such facilities bring including contributing to health and wellbeing. By improving health and wellbeing, this policy could also help reduce pressure on our local health care services.

WMPC welcomes this Policy but would like to see more emphasis placed on the effective scrutiny of the long-term deliverability of this infrastructure at the planning stage, including financial guarantees. We also highlight the importance of sustainable transport connections to such recreation provision, as well as adequate parking (please see our comments on INF2 and INF3 above).

We would also like this Policy to include a requirement for applicants to consult with the local community on the type of sport and recreation facilities desired in the local area.

Policy INF5.3 states that high quality on-site provision should be sought as per Annex 5 unless exceptional circumstances exist where off-site provision would better provide for the community, there is already excess provision or where site constraints cannot be overcome to deliver on-site provision. We are concerned that these exceptional circumstances could be used by applicants as a reason not to provide community facilities.

As we mention above in relation to INF1, 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.

INF 5.1 states that in accordance with other policies in this plan, the provision and design of new open space, sports and recreation provision will be expected to provide safe and accessible facilities, be sustainably located, include opportunities for habitat creation and sustainable urban drainage, and consider use of lighting including LED heads and switching gear. We support this, but would like this to be required of developers, rather than expected.

**97. Is there anything you think is missing from our Infrastructure policies?**

**Yes** In addition to our comments above, we would like to see more detail on the Borough's policy on managing the expected increase in demand for places at local schools and other educational establishments.

**98. Overall, how satisfied are you with the Infrastructure and Services policies**

3

## **Development Allocations**

### **Broadwater Farm**

On 23 November West Malling Parish Council held a public meeting to support the consultation on the Local Plan. This response is based on what residents said about the proposal to build 900 homes on this site.

Residents from the Parish were universally opposed to housing development on this site because:

- It would erode the boundary between East and West Malling and Kings Hill.
- Although largely outside the WMPC area, it closely adjoins West Malling, increasing the local population significantly.
- It takes away high-quality agricultural land from production at a time when home production of food in the UK is significantly and dangerously low.
- An increased local population will put very significant further pressure on West Malling in terms of traffic, parking, access to health services, nursery places and school places all of which are already beyond capacity.
- Would lead to increased pressure at West Malling Railway Station, where parking is rarely available during the week after 8.00am.
- Concern that the housing that may be built would be larger units that would be unaffordable to local people in housing need.
- No evidence that any housing for social rent would be included, just some for 80% market rents, which do not meet local housing need.
- Lack of any clarity as to where access to the site would be provided.
- Concerns about ability of service providers to supply water, sewerage and power to supply this number of new homes without detrimental service provision to existing homes.
- Impact on wildlife and biodiversity locally.

#### **Site to West of King Hall, adjacent to roundabout for Ashton way bypass.**

Principle objection from local residents were as follows:

- This land is Green Belt and should not be built on.
- If this site went ahead, it further erodes the distinction between West Malling and Kings Hill. We have already seen the Lancaster Park development nearby and the new housing to the East of King Hill by Fernham Homes and the new builds on the Orwell Spike development.
- Concerns that if agreed it will lead the way to further developments towards Offham.

#### **Land between Ashton Way and London Rd**

Almost all residents opposed this development because:

- It adjoins the ongoing development of the Forty Acres site, which many understand is having difficulty in selling, suggesting no market demand for the type of housing being constructed there.

- Further erosion of valuable green space.
- Further pressure on local services such as traffic, parking in West Malling and at the railway station, health care provision and nursery and school places.

### **Land North of Lucks Hill and West of Winterfield Lane**

Again, residents were opposed to this site being developed. This is because:

- Local roads are narrow and already beyond capacity, especially at school drop off and pick up times; this will cause accidents.
- Residents opposed to the loss of green space.
- Further housing would add to problems with local service provision, health care, nursery and school provision.
- Additional traffic on small country roads and more pressure on parking in West Malling.