

KINGS HILL PARISH COUNCIL RESPONSE TO TMBC'S CONSULTATION DOCUMENT REGULATION 18 LOCAL PLAN

Introduction

This is the Parish Council's formal response to the Borough Council's Regulation 18 Local Plan.

The document is in four sections:

- Introduction and Overview
- Appendix 1 Responses to the 50 questions in the Regulation 18 Local Plan
- Appendix 2. Sustainability Appraisals and additional information on sites relevant to Kings Hill
- Appendix 3 Traffic report sponsored by Mereworth PC, published in 2019

The Parish Council recognises that for the New Local Plan TMBC has adopted a new approach to The Local Plan Regulation 18 and we appreciate the involvement of the Parish Council and the public at this stage of the process. We hope that the Green Belt will be extended between Kings Hill and East Malling and West Malling.

Kings Hill Parish Council found the questions within the Regulation 18 Local Plan document extremely difficult to answer in a helpful way. The Parish Council has received much feedback from residents that the process is difficult, and the Parish Council is concerned that this will impact on the number of submissions.

Over the last few years, residents have fought hard to protect the countryside around Kings Hill from excessive development. The inclusion of these sites in the Regulation 18 Local Plan has created mental anguish and depression for residents, and there are frequent comments along the line of 'Maybe it's time to leave Kings Hill'.

We call for a rebalancing of the housing figures for Kings Hill by reducing the number of proposed homes in the area outside the Green Belt and a reassessment of Brownfield sites.

We recognise that many of the issues are the result of national planning regulation and process. We urge the Borough Council to use every opportunity to lobby government and our MPs to recognise that the special difficulties experienced by authorities on the fringes of the Green Belt.

In addition, Kings Hill has serious concerns about the enforcement of Local Plans; for example, Kings Hill Phase 3 (635 dwellings) was agreed by TMBC Planning, even though it was not included in the agreed Local Development Framework that existed at the time of the agreement. There are concerns about the sustainability of this development, as it was agreed without significant development of the village centre, and indeed has resulted in the inability to further extend the village centre as all surrounding plots are now occupied.

Kings Hill has specific constraints – all of the public open space and community resources are owned/managed by the KCC/Prologis or Rouse Kent and is subject to repeated planning submissions. In addition, all the community resources (even those paid for by the Parish Council, such as the community centre extension) are owned by the parties developing the site, with significant charges and significant restrictions for their use to the parish council and its operators, which is preventing effective use of these resources for the residents. Without guarantees on the local availability and accessibility of infrastructure, Kings Hill Parish Council consider that amenities cannot be assumed to be available and consider that any further development should not be allowed in the area.

Kings Hill has repeatedly been referred to as Urban. This is not correct, with the Office for National Statistics defining it as D1: Rural Town. It also does not have the range of infrastructure to make it an effective service centre. This makes the questions regarding spatial strategy and subsequent sustainability assessments for potential developments in the area essentially void, and Kings Hill Parish Council consider that the issues should be addressed, and the Regulation 18 consultation repeated with valid data.

Approach

Kings Hill parish has serious concerns about the spatial options being indicated by TMBC.

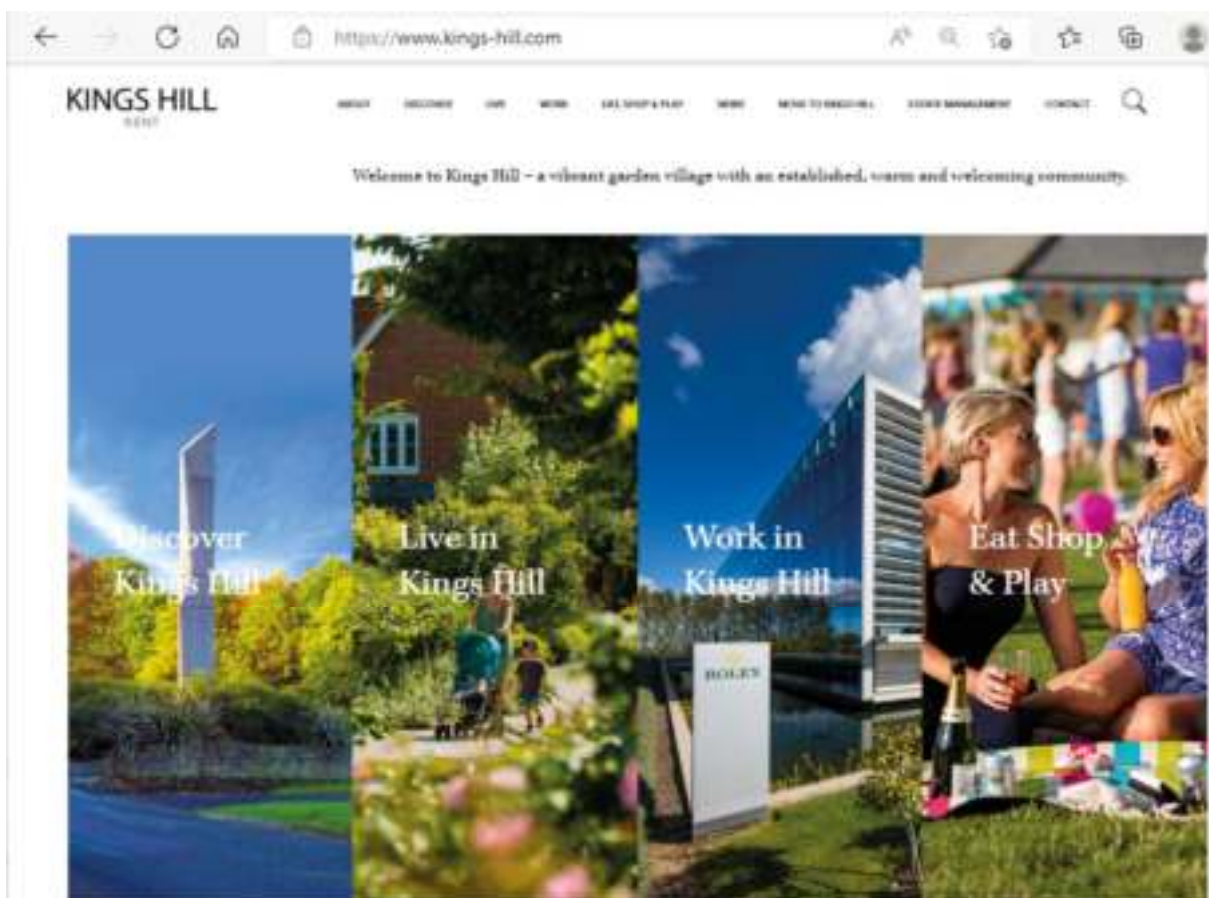
The National Planning Policy Framework Guidelines quite clearly state that the increase in allocations associated with a high house price / earnings ratio should be built on brownfield sites WITHIN existing urban areas. According to ONS, Kings Hill is currently designated as D1: Rural Town.

If meeting the housing target is not possible due to green belt constraints, then the NPPF does provide the option for the borough to provide an alternative proposal which is achievable, and not destroy the character of areas of the borough which do not have excessive house price / earnings ratios.

Kings Hill is at a crossroads. We need to maintain Kings Hill has a great place to live; more houses will impact the quality of life for residents.

Infrastructure

Kings Hill is marketed as a garden village, with limited resources at its centre.



Over the years, residential building has been extended with additional supermarkets (Waitrose and Aldi), but these essentially have been (or intend to) delivering essentially the same scope, with the intention to cover the whole household weekly shopping.

The centre of Kings Hill is closely hemmed in by residential developments, precluding options for expansion to meet the additional requirements for residential developments which already have planning consent, but have not yet been built and occupied, never mind the potential for developments in surrounding areas.

Without further planning allocations, Kings Hill is already contributing about 1,000 dwellings to the proposed local plan through agreed planning consents; more if you include Forty Acre Field development in the numbers!

There are very significant infrastructure issues already with Kings Hill, including:

- Primary Healthcare is severely limited, with the local surgery over-stretched, and there is no space to build a larger surgery as has been identified as a requirement to supporting an increased population. We are concerned that proposals to build additional surgeries will not alleviate the problem as the cost of manning branch surgeries can be prohibitive; the purpose-built surgery at Leybourne Chase was never used as a surgery, and the West Malling surgery has been closed.
- There are constraints on schools, especially secondary schools, where pupils can take more than two hours each day in travelling to and from the school
- Inadequate Parking even for the existing shops
- Poor Mobile phone signal from all four major providers
- Frequent Sewage smells indicating infrastructure issues
- Water supply is of concern with reports of low water pressure on the hill and burst water mains nearby
- Shops are largely limited to three competing supermarkets, severely limiting range of services
- Safeguarded Sites for Employment have been built on with dwellings. Nowhere to expand the centre of Kings Hill.
- Road Network is entirely inadequate, with only one good road to the North, and that is potentially compromised by proposed building and other over-development in the area.
- Traffic has increased beyond that for which the roads were designed, leading to pressure for double yellow lines but without any consideration for parking requirements or electric car charging for residents
- Kings Hill is not linked effectively into the public footpath or cycle way network compromising KCC Active Travel plans
- Most Public Open Space assigned for Kings Hill residents is on private land and is being reassigned, withdrawn and/or built on

Kings Hill Parish Council wishes to emphasise the need for high quality residential design, particularly in applying design for life standards.

We are aware that the Borough Council has chosen not to be specific about the housing numbers which could be accommodated with some of its proposed sites. However, this makes it very difficult indeed for residents to understand and balance how far each meets the Borough's identified needs.

Residents reported great difficulty following the Regulation 18 Local Plan and found the questionnaire particularly inscrutable. This has significantly reduced the level of involvement, significantly reducing the value of the consultation.

The role of 'green belt' in the assessment of sites in favour of others is also entirely missing in the Appendix 1.

Area Character and Recreation

Kings Hill is a Garden Village. It has central green areas in the middle of Phase 1 Pippin Way, around the main road entering the residential area (around Tower View) and the cricket pitch. Linear Park in Phase 3 may be a significant area, but since the surrounding houses face onto it, the effective area will be much reduced when the current house building is complete, as owners' front paths run to the main paths through the park; its hill and large children's play areas very much restrict its use by any other than young children, except for a walk through or dog walking. To a large extent, the green areas around Tower View are equivalent of the village green, and are used frequently for exercise, dog walking and, in the winter, sledging. Kings Hill Parish Council recognize the intention to find brownfield sites within urban areas, though these are key to the character of the area, and their loss would result in an unremitting sea of closely built houses, and as stated above, it is considered inappropriate to consider Kings Hill to be urban now. The potential loss of wildlife areas is also of concern, though more needs to be done to maintain them according to the original planning consents.

The area of Kings Hill, West Malling, East Malling, Mereworth, Wateringbury are separate villages, each with limited resources. If all the suggested development sites are developed, there will be little gap between these five villages. There used to be policies regarding anti-coalescence, and it is suggested that such anti-coalescence policies should be continued.



Indeed, much of the green space assigned to Kings Hill (Heath Farm) is owned by one of the parties developing the site, and whereas it has been available in the past, there are increasing pressures to take this out of public access. Examples include the proposed development on Heath Farm next to Wateringbury Road (withdrawn by the that party developing the site during appeal) and the fields North of Amber Lane; the land assigned for Phase 3 public open space is currently being earmarked for the green canopy, with statements from the party developing the site that the area will be fenced off; this is not consistent with current planning guidelines. There is the risk that the development will result in very limited access to open space for residents of Kings Hill and a long-term solution is

required. Kings Hill parish council consider that no further development should be allowed in the area until this issue has been resolved.

Affordable Housing

Many residents have referred to a lack of genuinely affordable housing. We ask the Borough Council to lobby Government and our MPs for changes in housing provision arrangements which deliver genuinely affordable housing. We believe that Local Authorities should look to ways to regain their role as a provider of social housing to address the national housing crisis, especially in areas such as ours of high house and land prices.

Migration into Kent from London and elsewhere means that KH remains a popular place to live. Private housing prices remain high and beyond the income of many local people as The Way Forward indicates.

Appendix 1: Questions

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

Element	Select (no limit)
A place where the range of housing needs are being met in full and affordability is much improved.	
A place where there are plentiful jobs opportunities, both within the rural and urban economies, to meet the needs of local communities.	
A place with well-designed, accessible, homes and neighbourhoods that are safe, legible, energy efficient and respect the local character.	
A place where people and communities are connected digitally in an effective and reliable way.	
A place where biodiversity thrives alongside communities.	
A place where landscapes and open countryside are respected and can be easily accessed and enjoyed.	
A place where there are plentiful opportunities to enjoy the borough safely and healthily by cycling and walking.	
All are equally important	X

Note that the house price / earnings ratio is not an issue for Kings Hill, and hence the first is not a specific priority for Kings Hill even though it is a definite issue for the borough.

Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain

No.

The first fact is that Kings Hill is NOT an urban area, either according to the definition by the Office for National Statistics <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about> or by the infrastructure of which it consists.

According to the ONS, the area of West Malling and Kings Hill is designated as D1: Rural Town; an overlay of the latest map from ONS is shown below, with Blue being Urban, Brown being Rural Town, and Green being Rural.



In addition, the population estimate for Kings Hill in 2020 is around 9,000, which does not include it in the definition of Urban.

Typically, an urban area is characterized by a population that largely works locally. However, without the urban infrastructure, Kings Hill is largely a commuter belt, and the models that are applied to match transport, communications and resource access should be updated to reflect this; the assumptions in the existing Regulation 18 Local Plan are clearly inaccurate. The original design of a garden village has been abandoned in preference for higher immediate profits for developers with more residential development and removal of safeguarded employment land without the commensurate improvements for the infrastructure.

The next question is whether it should be considered as a service centre. Given the limited nature of the resources provided, and the restrictions on access to those resources, Kings Hill Parish Council consider that King Hill should not be considered as a rural service centre but be considered as an “Other Rural Settlement”. The resources available within Kings Hill are restricted in terms of availability, scope, and access. Indeed, Kings Hill relies on multiple service centres around the area.

Kings Hill does not have the resources for an urban area. Typical resources include a police station, fire station, library, hotels, department stores, DIY stores, petrol station, furniture stores, jewellers, clothing stores, pubs (Kings Hill only has one!), local shopping areas and the like; without such resources, an urban area is not sustainable, as it will result in excessive levels of traffic to other areas. Note that there are currently two supermarkets, with a third being built. These are covering very

similar scopes (aiming to provide for a full weekly shop for a household), so completely fail to provide an overall service to the requirements of residents; indeed, it looks like the latest supermarket being built is resulting in consolidation in existing services, which will ultimately lead to a reduction in the choice for consumers. There are concerns about the sustainability of this setup.

Kings Hill residents use the services in West Malling, including shopping and hospitality, post-office and library.

However, it will make it very difficult to use if there is nowhere to park. Limitations of parking is increasing the requirement to travel to more distant centres, such as Maidstone, Tonbridge, and Sevenoaks for essentials and for entertainment. However, the bus provision means that the only practicable access to these resources is typically by car (or taxi); this is not sustainable.

There are identified issues with the existing infrastructure on Kings Hill. These include:

- **Parking**
The restrictions on parking in the village centre, the supermarkets and the **Development Management**, has led to an increase in parking on residential streets by Business personnel, residents and visitors . Increased housing in Kings Hill will exacerbate the situation.

Typically, no parking is available for effective use of the infrastructure beyond the private parking that is associated with each of the three supermarkets. For example, parking is for limits of 2 or 3 hours, which is often inadequate for evenings out at local restaurants; this is reducing the viability of the smaller shops and restaurants and effectively making them unavailable for residents outside of Kings Hill.

- **Mobile signal**
The four mobile providers are struggling to provide signal to residents in Kings Hill; one recently checked on Ofcom and obtained the following data:

Provider	Signal	Data
EE	Yellow warning triangle	Green checkmark
Three	Red X	Yellow warning triangle
O2	Yellow warning triangle	Green checkmark
Vodafone	Yellow warning triangle	Yellow warning triangle

The issues are getting worse as the number of residents attempting to use the services increase. Adding further housing around the area will exacerbate the situation

- **Sewage**
There is frequently a smell of sewage around the West end of Beacon Avenue, indicating that the sewage network has issues which have not been resolved even though the issue has been present for several years. Adding further housing around the area will exacerbate the situation
- **Primary Healthcare**
There are frequent reports in the media in the area where residents have had difficulty getting access to primary healthcare. In some cases, it appears that people have given up, which could be a serious risk if they have a progressive disease such as cancer, as the result

could be much higher costs to the health service, and lower quality of life or earlier loss of life for the individual. The issues with access to primary healthcare has also resulted in increased use of other resources such as Accident and Emergency services at Maidstone and Tunbridge Wells hospitals, which is not sustainable. Adding further housing around the area will exacerbate the situation.

Although it is recognized that this is an issue throughout the borough, anecdotal evidence does indicate that neighbouring parishes have twice as many GPs per 1,000 registered patients when compared to Kings Hill. WMPG has indicated that there would be a requirement to expand the current surgery to enable it to support an expanded population, but there is no real option to expand the existing premises and splitting a surgery between multiple sites has been shown not to work, with the West Malling surgery having been closed, and evidence from Leybourne Chase, where a surgery was built but never used as a doctor's surgery

- **Water supply**

There are increasing reports in the media of low water pressure around Kings Hill. This indicates a potential issue with supply, which is critical in this area, as houses are typically not built with a water tank. To get higher flows of water to houses, the water pressure must be increased; however, there are also reports of burst water mains such as the one that closed the A20 recently, which may be associated with this activity. This is more of an issue for Kings Hill as it is on the top of a hill, and hence more pressure is required to get the water to residents. Adding further housing around the area will exacerbate the situation.

- **Shops**

There are three competing supermarkets, but these cover essentially the same scope which means that there is not the diversity of services that would normally be expected given the retail floorspace. The remaining small shops are poorly provided with parking and located in areas of poor footfall, which means that, with high rents, there is not the vibrancy and dynamics that should be associated with such an opportunity.

- **Safeguarded Sites for Employment**

The remaining sites that were previously safeguarded for employment have been built upon. Although one of these sites has subsequently been used for retail, this was achieved by squeezing all the agreed housing into a smaller area than originally agreed, and the acquisition of assigned public open space, which has impacted on the quality of life for existing and new residents, with significantly increased traffic in residential areas and loss of public open space.

- **Road Network**

Kings Hill has been built as a self-contained road network connected onto a single road, the A228, with a primary access road (two-lanes in both directions onto Ashton Way), and a secondary much-lower capacity access road (single lane in each direction onto a small roundabout on A228 at Gibson Drive). Access to the M20 can be slow with congestion at the roundabout, and relatively frequent congestion on the motorway network in this area especially with the excessive residential developments along the A228 to the North of the M20, impact on connectivity around this area of the country. The access to the A20 is via a link road, which is frustrating for drivers frequently being held at traffic lights for extended periods and undertaking and overtaking by pushy drivers making the whole experience less than ideal. In addition, the A20 itself has been monitored over several years, and a recent

report concluded that just about all junctions on the A20 in this area were at, or beyond, capacity; there are multiple AQMAs along the road due to the congestion, and its use for ambulance traffic to and from Maidstone hospital, along with the severe congestion along Hermitage Road mean that the impact of any further development in the area should be predicated on the requirement to improve the road network. To the South of Kings Hill, the A228, although being a trunk road, is considered narrow, being less than 6 metres in width in places, which means that, when articulated lorries pass, since their full width including rear view mirrors is greater than 3 metres each, overlap the footpath, which is used by school children whose buses from around Tonbridge drop them off at Mereworth roundabout before proceeding along the A26. This is not sustainable with the current population and will be exacerbated by additional development in the area; relatively frequent accidents and breakdowns in the area due to traffic queues has an excessive impact on drivers in the area, and on several occasions has resulted in virtual gridlock in the centre of Kings Hill itself.

Given that the road network within Kings Hill is not designed to allow for additional development around the site, any such developments will need to rely on the extended road network to provide access to a service centre. For example, it was recognized that, even though the proposed Broadwater Farm development was physically bordering the rest of the Kings Hill village, the primary connectivity was via the A228 near West Malling train station, making a round-trip to the centre of Kings Hill of around 5 miles. This is clearly not sustainable. Other developments in the area, such as Heath Farm on the Watlingbury Road would require a round-trip journey of more than 10 miles (via East Malling and the A20) or more than 12 miles (via Watlingbury, the A26 and the A228) even though the site is part of the Kings Hill development.

Developments in the area have already increased the level of traffic on the quiet lanes that were intended to provide for recreation for the residents of Kings Hill and increased vehicle speeds have significantly reduced the value of these roads, reducing their use for recreation and impacting on the wellbeing of residents of Kings Hill who can no-longer feel safe walking or cycling along these roads. Additional developments around East Malling, West Malling and Watlingbury will increase this effect further impacting on the wellbeing of residents of Kings Hill

The issues with traffic queues through Watlingbury traffic lights and along the A228 South of Kings Hill already require action, given the high pollution levels evidenced by the AQMA in that area. Increased development in the area will significantly exacerbate the situation. In addition, the A26 is used as an alternative route for emergency traffic where the A20 is congested, and delays through the Watlingbury traffic lights and surrounding roads add significant risks with respect to response times for emergency vehicles.

In addition, the main access to Kings Hill is a private road that can, and is, closed at the whim of the one of the parties who are developing the site; this road is off the West Malling bypass. Thus, rather than being a hub from which roads disperse to neighbouring areas and other service centres, Kings Hill is reliant on a single road; this is clearly not the nature of an urban centre, and if further housing is to be provided in the area, a radical rethink of transport is critical.

- **Traffic**

The increased traffic associated with the increase of housing in the area, has resulted in

consideration of double-yellow lines along the main routes around Kings Hill. However, the speed of traffic has also been increasing, resulting in more frequent reports of pets being killed on the roads and complaints on social media regarding car drivers. The parking allocations on Phase 2 do not meet TMBC guidelines (e.g., one example: a five-bedroom house, with one parking space in front of a single garage and no visitor parking) and a solution is required before additional housing exacerbates the situation. In addition, when the Ashton Bypass is closed, e.g., for an accident (which appears to be more frequent already) or resurfacing, the traffic in the surrounding areas cannot cope, and journey times are significantly extended.

Other changes that have added to the traffic in the area, and which is not taken into consideration in current traffic estimates, is Blaise Farm anaerobic digester, which takes lorries from various areas around the Southeast. Further work is required to get traffic levels with appropriate projections, prior to further housebuilding in the area.

- Active Travel**

Kings Hill is not linked effectively into the public footpath or cycle way network. Existing proposed developments would remove the value of the Kent County Council strategic cycle routes in the area. Currently, the main cycle and pedestrian access is along the A228 to the North, which is very unpleasant for pedestrians and cyclists, with vehicles often exceeding 70mph only a few feet away, and lorries travelling up to 60mph creating significant air disturbance impacting the safety on that route.
- Public Open Space**

Much of Heath Farm is a public open space, and its role was assigned as such during the appeal process for Kings Hill Phase 2. However, much of the value has been significantly reduced by subsequent assignments, such as woodland with access restricted by fallen barbed wire fences, woodland which has become overrun by brambles restricting access, and assignment of parts of what was meant to be Warren Woods country park as relocation areas for protected species, meaning that the value to residents has been significantly reduced. Indeed, the loss of access to the fields North of Amber Lane have meant that most of the available access in the area is via public footpaths and permissive routes which are often narrow, making separation for dog walkers significantly more difficult and resulting in more issues associated with poor dog behaviour because of the inability to manage encounters between animals.

TMBC have allowed the strategic employment sites in Kings Hill to be re-purposed for housing. This fundamentally changes the nature of the settlement, and the addition of further housing without significant employment land is unsustainable. Again, this is moving away from the potential of an urban area characterization into more of a dormitory town.

Q.3. Which spatial strategy option do you prefer?

Strategy	Title and description	Preferred strategy – indicate with an ‘X’ below
Option 1	Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty	

Option 2	Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements.	
Option 3	Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements.	
Option 4	Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.	
Option 5	New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service	X
	centres and other rural settlements, as well as a new settlement/s.	

Q.4. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)?

Much of the increase is due to the high price/earnings ratio, which is primarily associated with the Tonbridge region. The instructions associated with the uplift are that the intention is for brownfield sites in urban areas to be used for the uplift. Thus, the plans are not consistent with the government guidelines. Brownfield sites must be used where available, even if they are in green belt, such as the sand pits around Borough Green, and other areas around Tonbridge. Much has been made of the success in the prevention of the development of brownfield sites in Tonbridge, which is contrary to Government guidelines.

Much of the development over the last few decades has been oriented around extensions to existing towns and villages with limited enhancement of resources within those location. This has resulted in significant pressure on the majority of resources in those towns and villages. This includes primary healthcare, parking, roads (especially rural roads that are include those assigned as quiet lanes

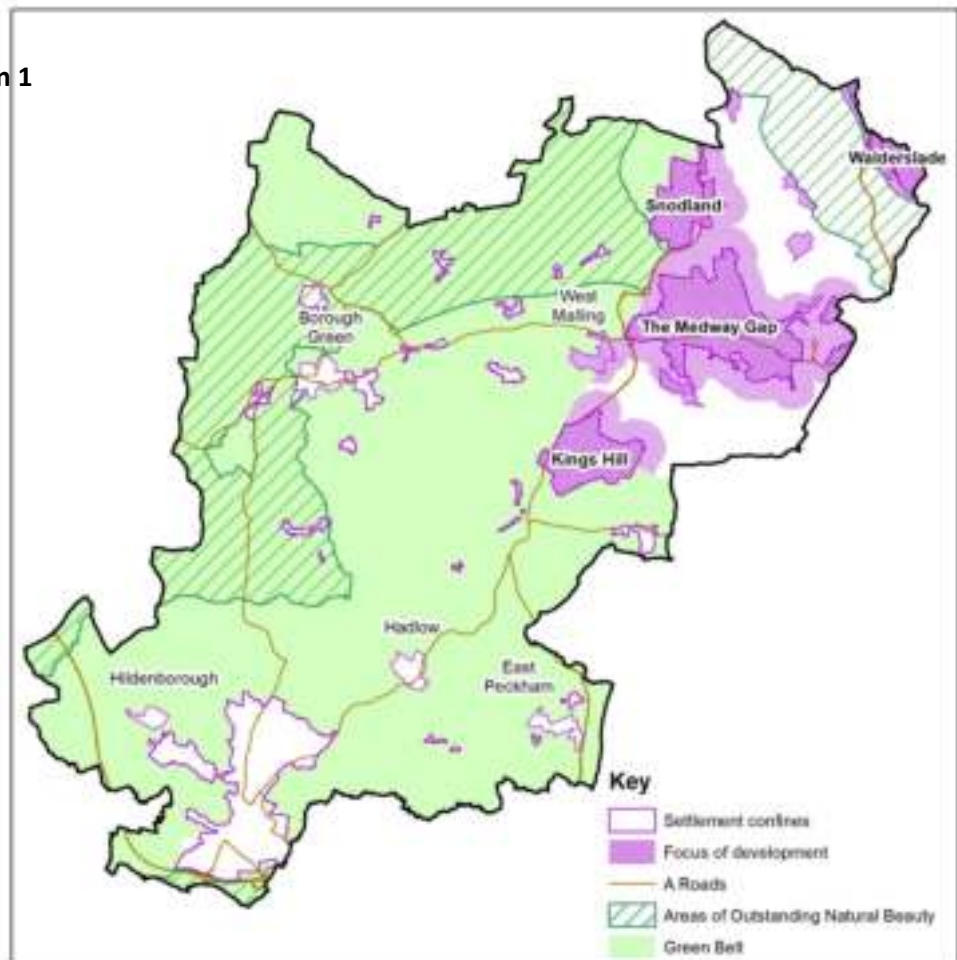
There are brownfield sites in green belt areas which should be considered as a priority for such development, in the same way as development of Bluewater shopping centre and the neighbouring housing developments.

The number of required dwellings is more than the resources required to be available in the various habitation centres, and as such, a new habitation centre should be considered.

The continuous development around existing settlements without adequate uplift in infrastructure, such as parking, has meant that additional development would be unsustainable. The concentration, based on avoiding green belt where possible, on the best agricultural area in the borough is inappropriate, and an overall review of approach is critical.

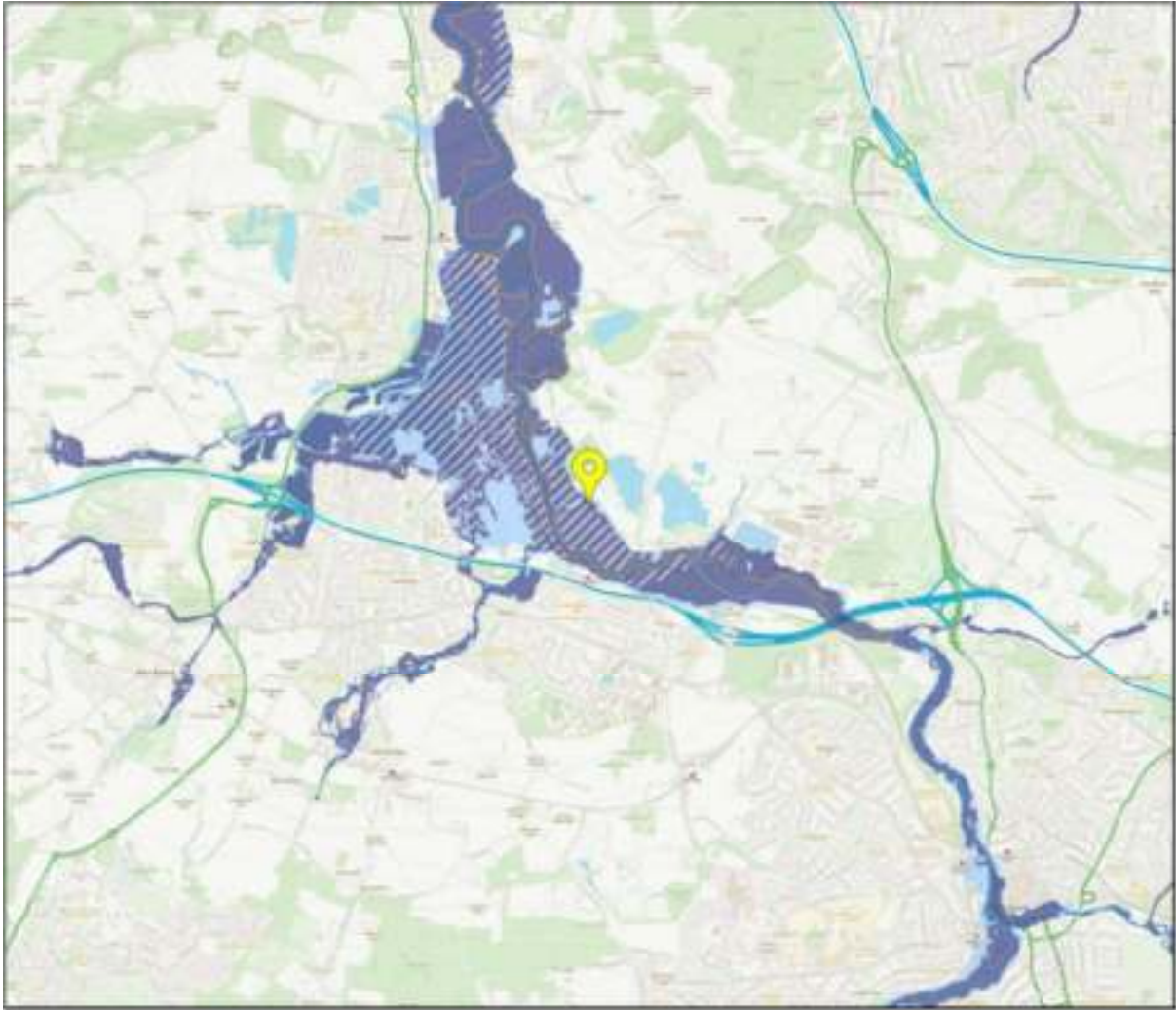
Our interpretation of the TMBC Housing Market Delivery Study is that TMBC has had a higher level of CAGR (Compound Annual Growth Rate) for new builds than most of Kent (approximately 50% higher than the average for the South East). Much of the increase in demand for housing is coming from people moving out of London. The primary purpose of the green belt is to avoid the London sprawl destroying the surrounding countryside, and I consider that this aim is important to maintain. However, the result, where locations closer to London are being built on because of the shape of the green belt, means that the result is in contradiction to the aims of the Green Belt. Based on the TMBC report, we consider that the high rate of new builds in the borough is encouraging the moves from London to the borough, and this is exacerbating the issue, and neighbouring boroughs should be approached to see whether some of the TMBC housing obligations can be satisfied by them, under the duty to co-operate. Alternatively, use of urban and brown field sites is likely to be less attractive to people moving from London and make such developments more available to the local population, which may go some way to alleviating the high house price / earnings ratio that is meaning that government targets for the borough are much higher than the ONS estimate for increases in housing need.

Spatial Strategy: Option 1



Much of the most versatile agricultural land in the borough is built over. There is now pressure on the remaining agricultural land

Much of the proposed area is in flood plain.



The option does not address the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

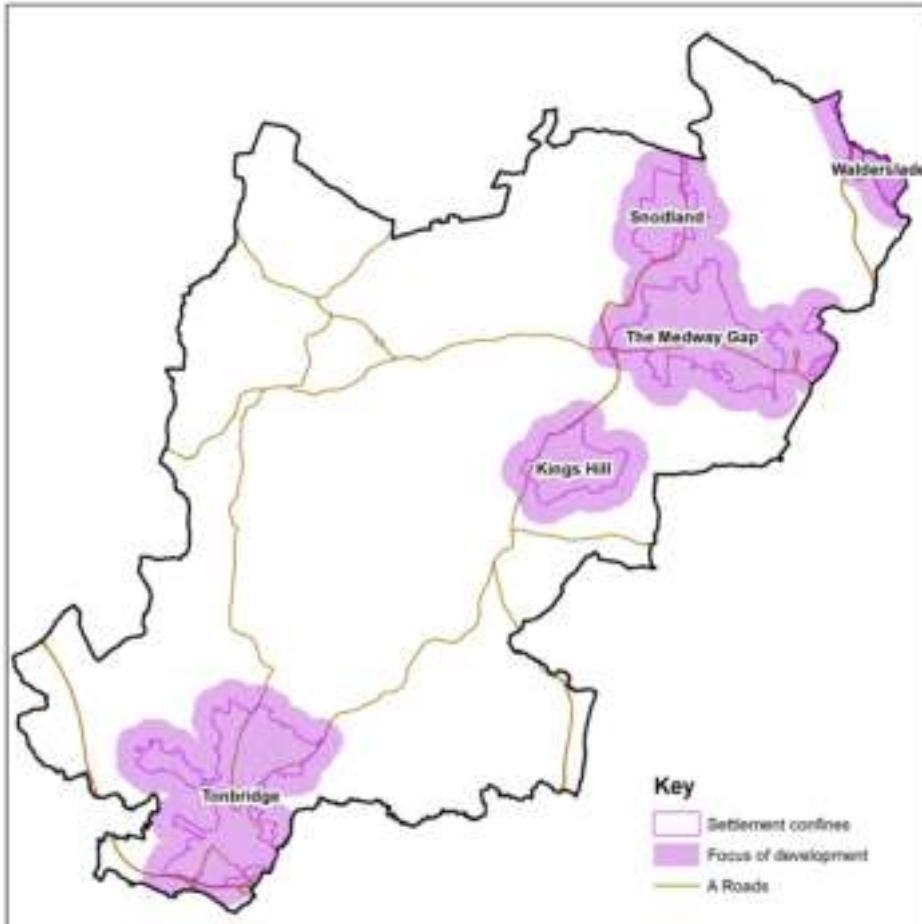
The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Kings Hill has one main entrance on Tower View which is private and closes once a year for 24 hours on Christmas Day. Several surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area **and must not be** included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 2



Much of the most versatile agricultural land in the borough is built over.

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

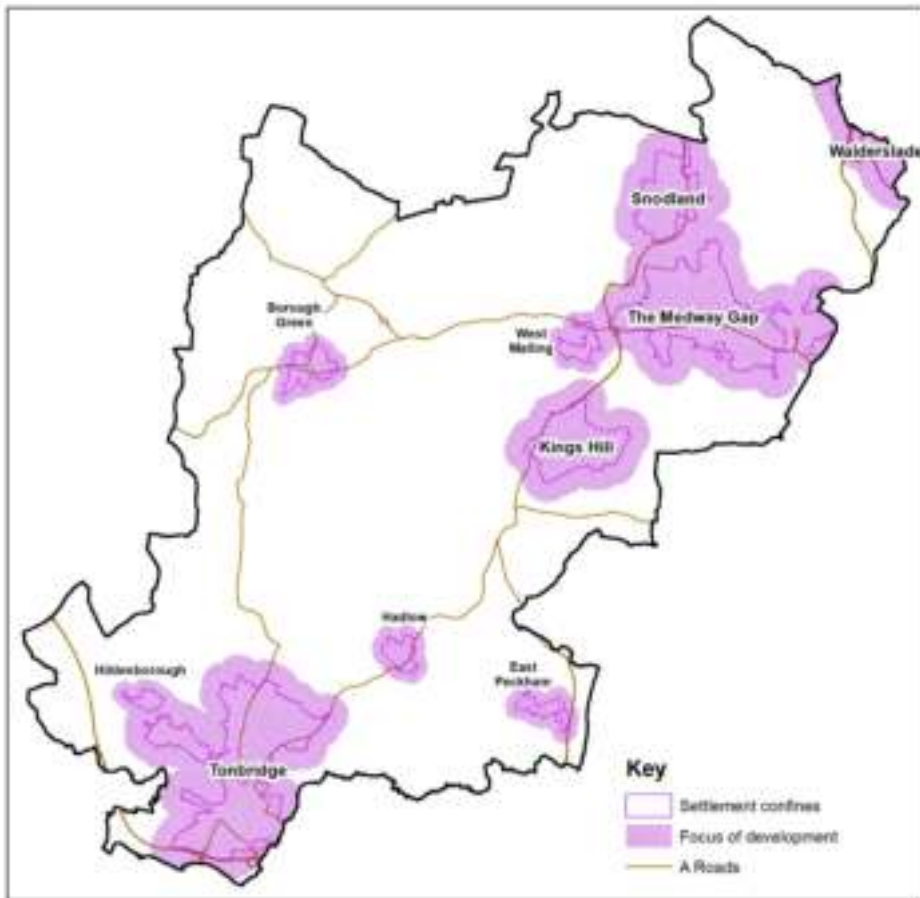
The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Kings Hill has one main entrance on Tower View which is private and closes once a year for 24 hours on Christmas Day. Several surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

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Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 3



Much of the most versatile agricultural land in the borough is potential to be built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

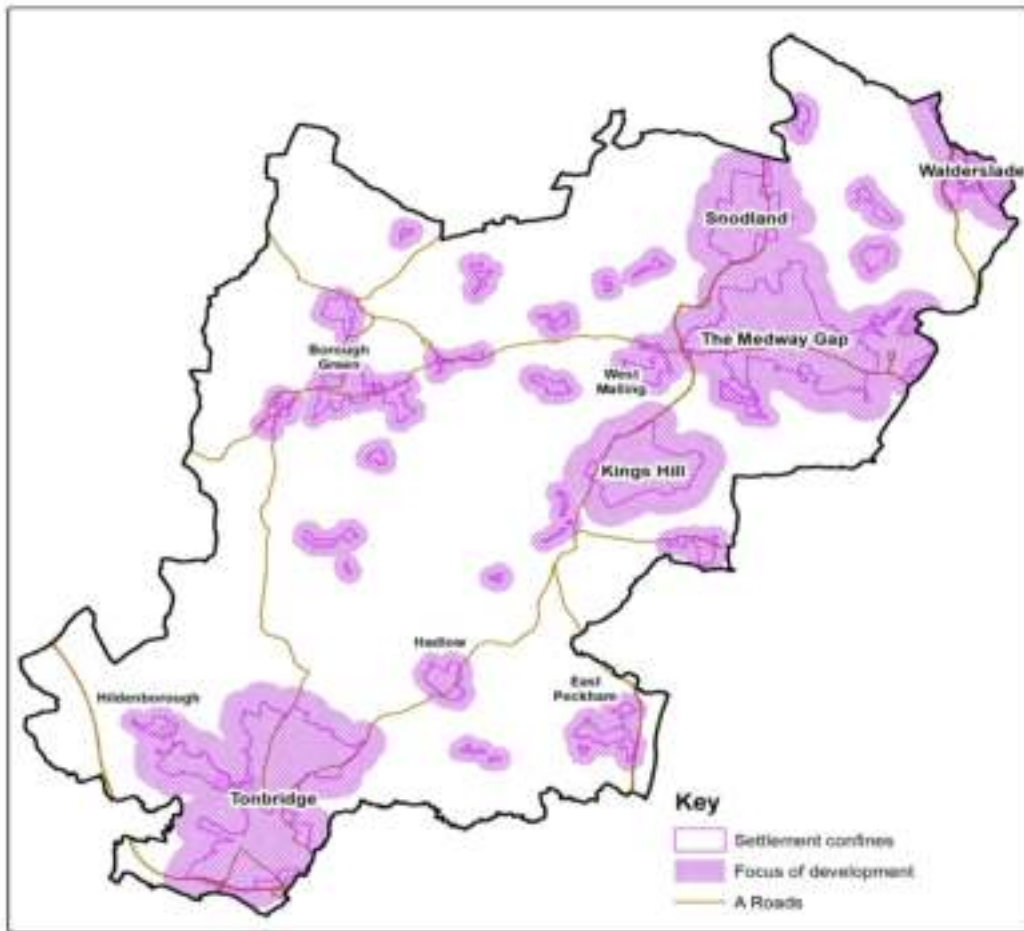
The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of one of the parties developing the site. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 4



Much of the most versatile agricultural land in the borough is potential to be built over.

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

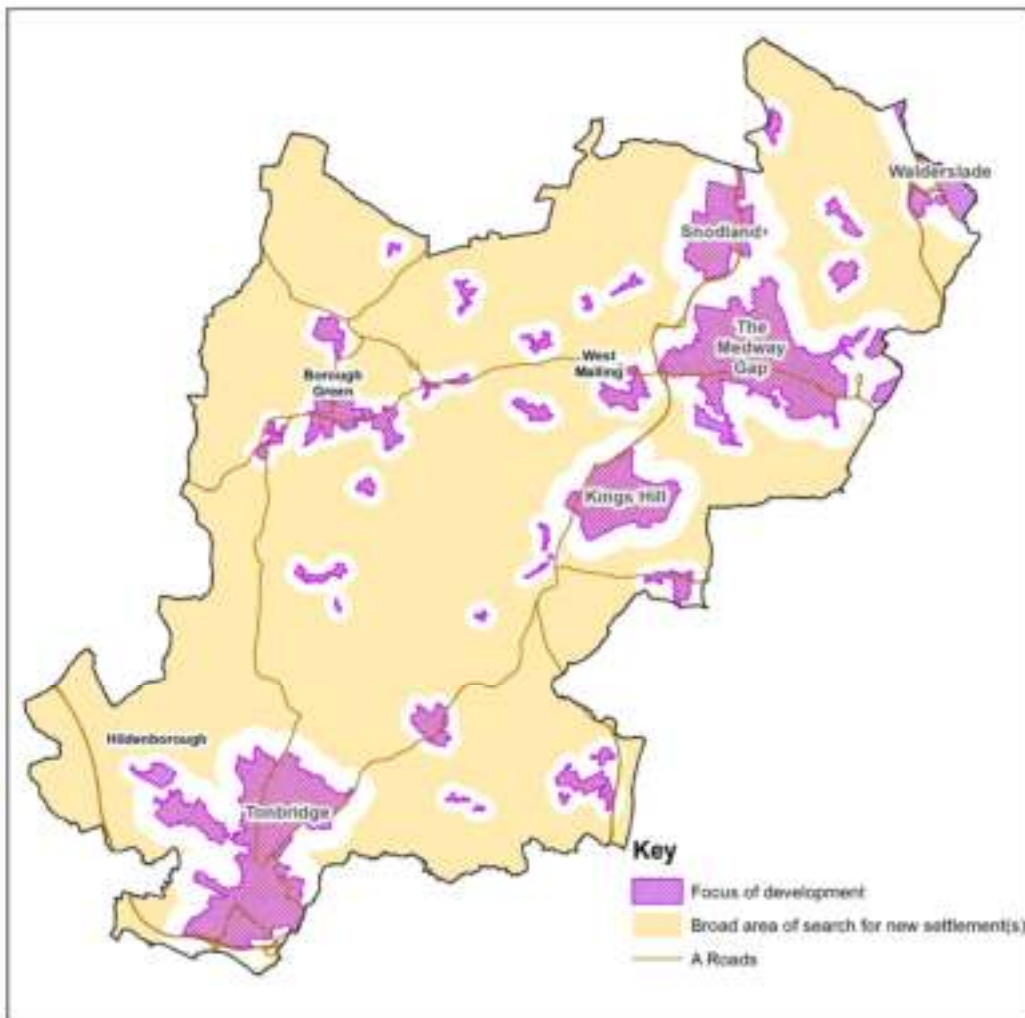
The continual recent development around village centres has meant that most are already overloaded and struggling and more such development will exacerbate the situation.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of one of the parties developing the site. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 5



A new town would become an urban area and would require pre-implementation of infrastructure. It does not seem that TMBC are willing to put in such investment. In addition, much of the land would be more costly for developers to develop and would likely only be accepted if there was no alternative. In addition, the road network should be the primary focus for development to ensure that adequate connectivity to service centres was provided. Likewise, new connectivity for water, gas and electricity would need to be implemented. There was brownfield land in green belt that was assigned in the previous (withdrawn) local plan, and that should be re-considered, even given the constraints identified here.

Q.5. Which quantum option for the spatial strategy do you prefer?

Strategy	Title and description	Preferred strategy – indicate with an 'X' below
Option A	Quantum 1 – Meeting Assessed Housing Need	X
Option B	Quantum 2 – Meeting Assessed Housing Need + up to 10%	

Q.6. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)?

The requirement should be met, which includes a buffer. However, much of the increase is associated with the high house price / earnings ratio, which will not be affected by the proposed development and as such, the local plan should reflect the government guidance on the location of the required development. Housing assessed need is warped by the high price in the green belt areas, and this needs to be addressed.

Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.

Chapter 4 appears to try to compare options with no specific conclusions. However, there are concerns that the descriptions are not balanced.

With regards to Kings Hill, CP11 deprecates any development outside of the town itself, CP12 similarly constrains development around West Malling and CP13 should be considered.

The road network around Kings Hill does not support expansion; there are no properly accessible points to link in any significant development without congestion and safety issues being created.

There are excessive active travel issues; Kings Hill is not effectively connected to the cycle and public footpath network, and joint use of pavements for pedestrians and cyclists where the pavements do not meet the guidelines for such use, impacts take-up of active travel, and discourages walking and access for disabled people.

Kings Hill Parish Council would like to highlight that the KCC plan for cycle connectivity for the previous decade has not been implemented; this would have resulted in significant improvements. In addition, Kings Hill Parish Council considers that the developer obligation to link onto the public footpath network has not been effectively addressed. These issues are resulting in rapidly deteriorating infrastructure for active travel which needs to be addressed as a matter of urgency.

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

Yes/No Please explain and quote the individual site reference number

If you have a site that was not submitted during the Call-for-Sites exercise that you would like the council to assess for development potential, please provide details online using the PlaceMaker software.

No. The assessment is not balanced and does not cover overall impact. Two easily identified examples include:

- Building on car parks in West Malling must consider the impact of loss of those resources on local businesses and the vibrancy of the village, or impact on access to the rural hubs, e.g. for local businesses in Kings Hill that need to provide accommodation for visiting staff, or residents accessing libraries or post offices or the myriad of different small shops in the area.
- Building on Heath Wood has been designated as Brownfield, even though much of the area is Ancient Woodland protected by TPO (for which unlawful action has been reported to TMBC but no response has been received).

As such, the validity of the assessment is severely in doubt.

Detailed or summary responses for sites in Kings Hill are included below.

Q.9. Do you agree with this set of strategic matters? Yes/No. Please explain

Yes. There is a requirement to ensure that there is appropriate access to infrastructure for all sections of the community. The priority should be reviewed and agreed.

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

Strategic Matters	Select (3 in total)
Housing	X
Economic development	
Transport	X
Tonbridge (as the borough’s principal town centre)	
Retail	
Community facilities and infrastructure	X
Natural environment	
Built and historic environment	
Green Belt	
Climate change	
Other – please state and include in ranking	

Q.11. What are your reasons for selecting these particular strategic matters as priorities for the Local Plan (outline briefly)?

Quality of life for residents. Failure to consider climate change seriously will result in an unsustainable solution.

The required infrastructure needs to be in place before any additional housing is built.

Q.12. With reference to your answers to questions 5 and 6, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain

No. If the housing requirement cannot be met in line with guidelines, e.g. Tonbridge brownfield for around 50% of the requirement due to the uplift because of house price / earnings ratio, then the housing requirement should be challenged. The excess building on the best agricultural area in the borough is not an appropriate response.

Q.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?

Yes/No Please explain.

Yes, but the limit of resources in the existing rural centres must be considered to ensure that they are not overloaded by developments in those areas.

Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g., flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain

yes, but the mix should be dependent on the needs of specific areas, and not applied in a generalised fashion. Local issues must be considered.

Q.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? Yes/No Please explain

No, the overall needs of the borough should be put ahead of such priorities; there is already the option for redevelopment of existing plots where this is appropriate, and this has been successfully applied for many decades.

Q.16. Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products? Yes/No Please explain

Yes, the requirements for low cost housing is critical to the vibrancy of the area, such as for ensuring that health, retail, hospitality, farming etc. in the area can be supplied with suitable staff.

However, this needs to be provided in conjunction with appropriate transport policies. For example, the primary bus services for Kings Hill were subsidised for a short period by the Phase 3 development, but the subsidies have run out even before the development is complete, and this has resulted in threats to the bus services, and restrictions, such as no services covering the evening where residents may wish to make use of the hospitality services in neighbouring hubs.

Q.17. Do you agree with the windfall allowance methodology? Yes/No Please explain

No. Areas of Kings Hill have been changed from Business to residential, for example, resulting in 635 dwellings [Phase 3] more than the agreed local development framework in Kings Hill. This was agreed without a corresponding increase in infrastructure.

Q.18. Which housing matters are most important to you?

Housing Matter (alphabetical order)	Select (5 in total)
Accessible housing (e.g., for wheelchair users)	
Affordable housing – to buy	
Affordable housing – to rent	
Build to Rent	

Density of housing development	
Distribution of housing across the borough (taking account of where the needs are generated)	X
First-time buyers' housing	
Garden communities	
Gypsy and Traveller accommodation	
Home-working opportunities	
Infrastructure (schools, roads, healthcare, open space etc) supporting new homes delivered in a timely fashion	X
Modern Methods of Construction (MMC)	
Self-build and custom housebuilding	
Size of housing (1-bedroom, 2-bedrooms, 3+ bedrooms)	X
Size of housing sites	
Specialist housing for people with particular care needs	X
Tenure of housing (market purchase/private rent/affordable rent)	X
Travelling Show people accommodation	
Type of housing (flat/house)	
Other – please state and include	

Note that more needs to be done to ensure that houses are built to building standards; too many new properties have issues including excessive heat loss due to poor construction. The approach by NHBC of testing only a few houses and relying on large companies for consistency is not appropriate in today's market where houses are built by contractors largely selected on price, and not by employees of the large building companies.

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

Quality of life for residents. The size of houses selected to allow for low cost and family homes. The reason people move to the country is to get a better quality of living, so the provision of smaller one-, two- or three-bedroom freehold houses is more suitable than blocks of flats with extortionate service charges.

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

Yes/No Please explain

Yes: Kings Hill has seen the loss of many employment sites and excessive development of housing with no regards to an increase in infrastructure.

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

Yes/No Please explain

Yes, we agree with the key transport issues, but they need to be implemented BEFORE further development. There are too many cases where development goes ahead without proper consideration for infrastructure.

Q.22. Which transport issues matter the most to you?

Transport issue (alphabetical order)	Select (3 in total)
Bus services – linking developments to services and places	X
Cycle routes – safe links between homes and schools, other service, places and public transport	
Pedestrian infrastructure – safe links between homes and schools, other services, places and public transport	X
Rail – improving station access and links with cycling and walking routes	
Roads including junction improvements	X

Q.23. What are your reasons for selecting these particular transport issues as priorities for the Local Plan (outline briefly)?

Quality of life for residents.

There has been inadequate investment in the Kings Hill area for all of these, and all should be considered as priorities.

Q.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 high-quality urban cycle routes?

Yes, but only where adequate parking is already provided for residents. Designs require review and improvement to meet existing Kent Parking standards.

Q.25. What is your preferred strategy option for Tonbridge?

Strategy	Description	Consequence for the need for additional development land	Select preferred strategy
Option 1	Optimise densities on development sites within Tonbridge, particularly on those sites within the town centre, maximising their potential for residential and mixed-use development.	Minimise the need for the release of green field sites beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development.	X
Option 2	Conservative densities on development sites within Tonbridge, minimising the intensification of existing built-up areas for residential and mixed-use development.	Increase the need for the release of green field sites at and beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development.	

Q.26. What are your reasons for selecting this particular strategy option for Tonbridge (outline briefly)?

Option 1 is in line with government guidelines, associated with the uplift due to the high house price / earnings ratio in the borough.

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

The development needs to be balanced to ensure a vibrant town centre and safe suburbs.

Q.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? Yes/No

No, there should be a robust plan to ensure that housing needs are met.

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

No

Q.30. Do you agree with the key retail issues identified above? Yes/No Please explain

No: It needs to be more robust. The proposals are too woolly to ensure an appropriate strategy can be identified and followed through.

Q.31. Is there anything more that the council could do to make the borough's retail centres more attractive and successful? Yes/No Please explain

Yes: Improve access (road, train, cycle) and improve affordable parking. More diversity of retail outlets. The local plan needs to protect the availability of parking as an essential for the viability of the

town centre, and free or cheaper parking will encourage more footfall and frequency of visit. Reduce the spread of retail units requiring people to move between car parks between visits. Clearer pedestrian links between retail units. Keep trade outlets in sites further from the high street.

Q.32. Do you agree with this set of community facilities and infrastructure priorities? Yes/No Please explain

No. The level of detail is inadequate to allow a reasonable direction to be determined and agreed. Infrastructure is key to a sustainable approach but seems to be taking a backseat. S.106 funding should be acquired prior to the start of building of the site to ensure that the infrastructure is in place for the new residents. Kings Hill has specific constraints in that the infrastructure is owned by KCC/Prologis/Rouse Kent, and the application of much of the S.106 funding is of direct benefit to the developer

Q.33. Should Local Green Space be designated in the Local Plan? Yes/No

Yes. And this should be protected for future generation's use.

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

Yes. The area to the North of Kings Hill was identified as an Area of Local Landscape Importance (P3/7) in the 1998 development framework. This includes consideration for the vista from the North Downs Way. It was identified as the Best and Most Versatile agricultural land in the 2008 LDF and identified as an important wildlife corridor. However, it was assigned for development in the withdrawn 2018 local plan. Some of this seems to be related to the mislabelling of Kings Hill as an urban area, whereas ONS quite clearly designates it as Rural Town. In addition, previous policies designed to prevent the coalescence of villages seems to not have appropriate weight in current decisions. Therefore, it is demonstrated that Green Belt designation is required to protect its status and ensure that, as one of the few non-green-field areas of the borough, it does not get used as the dumping ground for new housing even though such housing is not justified when looking at the local area.

In addition, there is opportunity to offset loss of green belt around Tonbridge, to allow for development in that area which has the highest house price / earnings ratio in the borough, with the addition of green belt around Kings Hill, which has one of the lower house price / earnings ratio in the borough, allowing the government guidance to be more closely followed.

Q.35. Should the council be seeking more than 10% Biodiversity Net Gain, if viable? Yes/No

Yes, too much biodiversity has been lost in recent decades. This has been identified as a national issue. Note that the calculations on biodiversity need to be scrutinised, it seems very strange that developers can claim increases for biodiversity when replacing a mixed farm with a densely populated housing estate!

Q.36. Should the council allocate sites specifically for Biodiversity Net Gain within the Local Plan? Yes/No

Yes, but further analysis is required. Existing designated green space should be considered; it's much easier to maintain, than create new.

Q.37. Which design matters are most important to you?

Design matter (in no particular order)	Select (3 in total)
Developments that will function well and add to the overall quality of the area for the lifetime of the development	
Developments that are visually attractive	
Developments that are sympathetic to local character, history and landscape settings	
Developments that establish a strong sense of place and identity	
Developments that optimise appropriate density and scales	
Developments that create safe, inclusive and accessible places that promote health, well-being and have good facilities	
All are equally important	X

Q.38. What are your reasons for selecting these particular design matters as priorities for the Local Plan (outline briefly)?

Quality of life for residents is essential. Development should create safe, inclusive and accessible places to promote health and well-being.

Q.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? Yes/No Please explain

Yes. Kings Hill is a World War 2 Site. Many of the historical buildings have been lost, and more work should be done to save these sites.

In addition, the historical nature of the area of Broadwater Farm examples: the land anchors for the hop fields saved and referenced for history.

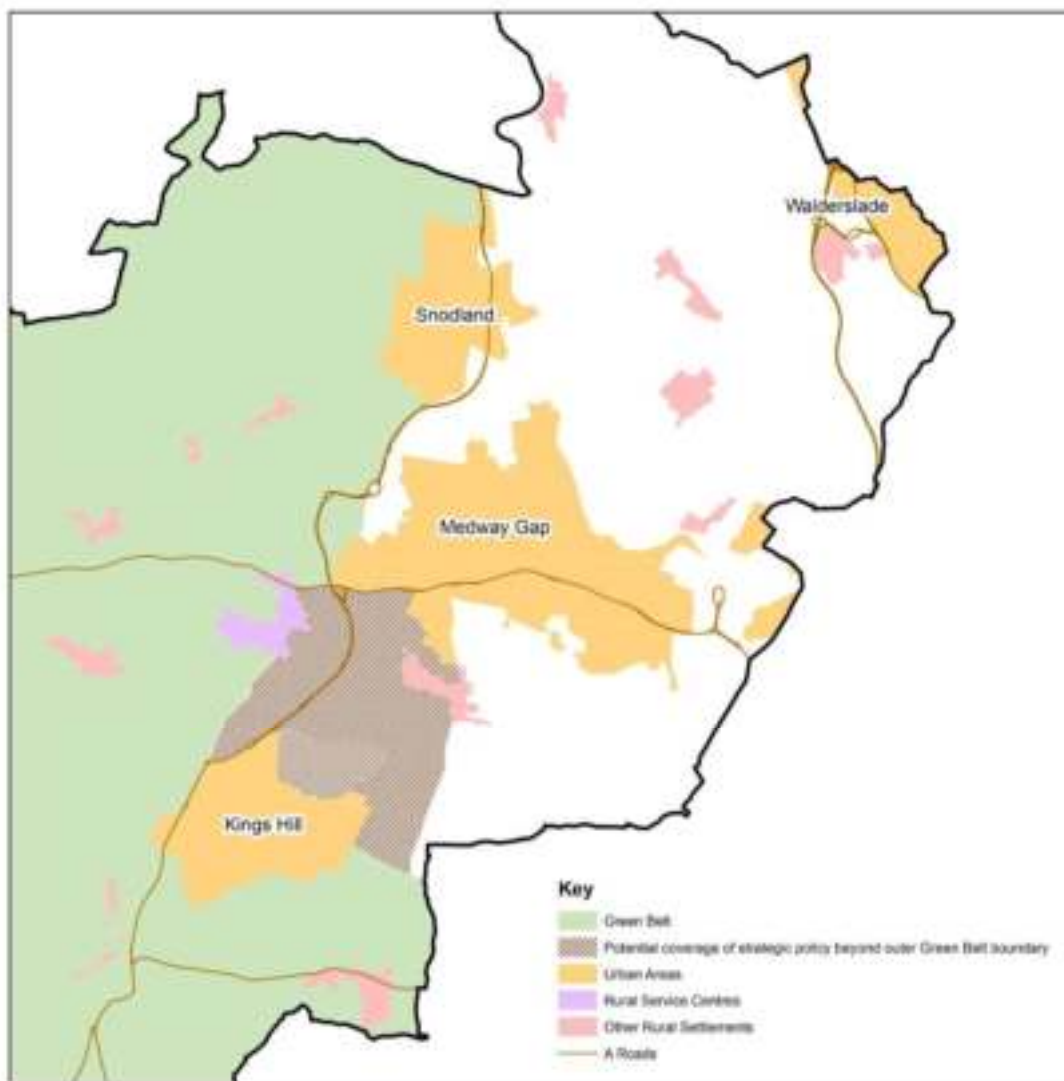
Q.40. Do you agree that there are exceptional circumstances, at the strategic level, for altering Green Belt boundaries (in principle) to help address assessed development needs?

Yes/No Please explain

Yes, Land around Tonbridge needs to be released from green belt to allow for development in that area. However, the overall size of the green belt area should be maintained. We need to ensure anti-coalescence and access to the countryside with opportunities for active travel for residents of Kings Hill to maintain the quality of life

Q.41. Do you agree with 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?

Yes/No. If no, please explain, highlighting additional/alternative factors that you consider need to be included in the review process.



Yes: The area North of Kings Hill is at risk for development due to change in policy by TMBC and a more robust approach is required to maintain the character of the area, including the views from the area of outstanding natural beauty from the North Downs. However, we urge TMBC to concentrate on the development on brownfield sites within the greenbelt area.

Q.42. Area beyond outer Green Belt boundary – strategic options

Strategy	Description	Preferred option – please select
Option 1	Extend the outer boundary of the Green Belt	X
Option 2	Anti-coalescence/strategic gap policy	
Option 3	No change – leave existing outer Green Belt boundary unaltered.	

Q.43. What are your reasons for selecting this policy option for the area beyond the outer Green Belt boundary (outline briefly)?

TMBC's Green Belt Study supports the case for exceptional circumstances, so Option 1 is supported as it appears to offer the most robust protection for the Broadwater Farm area, including anti-coalescence / strategic gap policy, as well as providing a clear rationale for the measured release of Green Belt land in the Sevenoaks and Tonbridge Housing market Area. A robust solution is required to ensure that the status of the area is maintained. People need access to green space to maintain quality of life, and this needs to be ensured. The best and most versatile land in the borough needs to remain as such to ensure food security.

Extending the Green Belt around Kings Hill would prevent the amalgamation of Kings Hill, East Malling and West Malling. This would protect the individual character of the settlements and protect the important green spaces.

Q.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?

Yes/No Please explain

Yes

It would be useful for TMBC to set targets for climate change considerations. This should include solar panels and other renewable sources. But better methods of inspection are required to ensure MMC are followed correctly and fully. The current system is spasmodic and inadequate, and dwellings with a high air permeability, as can be frequently found around Kings Hill, result in large heat loss and high energy bills.

Q.45. Do you agree that the Local Plan should set a minimum requirement for tree canopy coverage on new developments?

Yes/No Please explain

Yes,

The carbon sequestration by trees is important as a part of the aims of carbon neutrality. The destruction of 150,000 apple trees in the Broadwater Farm proposed development would go against such as strategy.

Note that there are concerns that recent tree planting has been associated with removal of the area from public access, and this needs to be addressed; such areas would be ideal for helping with quality of life if managed appropriately.

Q.46. Do you agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds?

Yes. Hedgehog highways and dormouse bridges and the like would encourage more wildlife in the area and reduce the damage done by existing development.

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

Climate change measures (alphabetical order)	Select (3 in total)
Active travel opportunities (eg cycling and walking) connecting developments with other places and public transport	
Decentralised renewable and/or low carbon energy generation (photovoltaic cells, wind turbines etc)	
Energy efficient, future-proofed buildings	X
Habitat creation – built fabric (eg swift bricks)	
Habitat creation – natural (eg meadows, hedgerows)	
Modern Methods of Construction (MMC)	X
Multi-functional green infrastructure (recreation, carbon sinks and biodiversity net gain)	
Passive design (orientation, layout, landscaping)	
Sustainable drainage systems (SuDS) (eg green roofs, water butts, retention ponds)	X
Tree coverage - increased	
Other – please state and include	

Q.48. What are your reasons for selecting these particular climate change measures as priorities for the Local Plan (outline briefly)?

All are important.

The best way to start improvements is to avoid actions which immediately have a detrimental impact.

In the light of the current energy crisis, well-insulated homes must be a priority for new-builds. Monitoring of construction is critical to ensuring that meet the insulation guidelines.

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

Local requirement (alphabetical order) (please identify 5)	Priority
Accessible and adaptable housing (disabled and elderly)	
Active travel (cycling and walking)	
Affordable housing – to buy	X
Affordable housing - for rent	
Biodiversity & Ecology	X
Energy efficiency	X
First Homes	
Indoor recreation facilities	
Internal space standards	
Modern Methods of Construction	
Parking	X
Public open space	X
Renewable energy generation (eg photovoltaic cells)	
Safety and security	
Self-Build and/or Custom Housebuilding	
Specialist housing (elderly, eg care homes)	
Sustainable Drainage (eg water butts and green roofs)	
Water efficiency (consumption within the home)	
Other – please state	

Note that all are very important.

Q.50. What are your reasons for selecting these particular local requirements as priorities for the Local Plan (outline briefly)?

Quality of life for residents.

Note that limiting choices seems inappropriate as all are very important and there are probably others that could be added

Safety and security are becoming an increasing issue due to poor design rules within the existing building developments, such as car barns and courtyard parking which result in dark areas where belongings cannot be effectively secured and can be the target for criminal behaviour. It is believed that the lack of youth facilities is significantly contributing to antisocial behaviour on Kings Hill, but the nature of the agreement with one of the parties developing the site precludes effective action being taken by the parish or the borough.

Appendix 2: Identified Sites

Kings Hill

59424 Clearheart Lane

SA Objective 1: To improve human health and well-being

Negative (-)

Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.

SA Objective 2: To improve equality and access to community facilities and services

Negative (-)

The local environment has limited community facilities. The community centre is inadequate for the current population and further competition would result in decreased availability for existing service users. The sports park is largely football (a new rugby pitch has been built, but not used significantly to-date, raising concerns about its viability) with four tennis courts, two of which have been permanently assigned to a single tennis club, limiting availability for ad-hoc hirers. The status of facilities, all being leased from one of the parties developing the site, means that there is potentially no long-term benefit to the community of the significant S.106 investments raising further concerns about long-term viability.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development

The site contains an existing green infrastructure asset that could be lost because of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.

The site is a major wildlife corridor joining the woods of Warren Wood and Cattering Wood. Loss of this important

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Negative (-)

This site is located outside a settlement. The boundaries of the settlement were sold off separately by MOD to protect the surrounding countryside and concentrate development on the brownfield land.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely (>=75%) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (-)

The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land. The area is registered by DEFRA as 'Priority Habitat Inventory - Deciduous Woodland (England)'. Site contains Ancient Woodland and TPO protected trees.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Major negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negative (-)

The Site is an area of woodland surrounding the existing development. This provides a green lung for the area, and helps prevent some of the worst excesses of temperature on hot days; it is well documented that trees have a cooling effect on the environment and that is evidenced when walking around Kings Hill on a hot day in Summer, where a walker will experience a wall of heat when re-entering the village from the surrounding woodland.

SA Objective 12: To protect and improve air quality

Negative (-)

The site is not within 100m of an AQMA. However, the secondary access has been determined to be via the Teston Road, for which the primary access to the trunk road network is likely to be through Wateringbury. The addition of houses with access along the Wateringbury Road is likely to increase the number of vehicles turning right at the A26 / Red Hill traffic lights, which will significantly impact the throughput of the junction and the increase in pollution in that area. In addition, the main access

road would be through a quiet residential cul-de-sac which already has significant parking problems, resulting in potential issues with access.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Uncertain positive (+)

The site is initially expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, this would be at the expense of destruction of Ancient Woodland, and mature trees that are subject to TPO; previous estimates of housing densities for this site are below 100 dwellings and hence the value is uncertain.

Previous KHPC Objections to Site

Kings Hill Parish Council would object to this planning application for the following reasons.

1. Kings Hill is increasing in size and is classed as higher up the settlement hierarchy and therefore in planning terms an area for development as it has the best sustainability credentials in terms of viability and accessibility to a range of services and public transport nodes including schools, healthcare, shops, buses, and trains. This infrastructure is now becoming saturated due to the planning permissions already granted and the proposed Broadwater Farm development in the emerging local plan. This proposed development would cause unacceptable harm to the character and appearance of the surrounding area and have an unacceptable impact on the safety of the highway network, thereby adding to the factors weighing against this proposal.

2. The proposed development by virtue of its overall quantum, size and proposed means of access would cause increased levels of vehicular activity along Clearheart Lane giving rise to noise, environmental issues and disturbance which would be harmful to the residential amenities of the occupants of properties along Clearheart Lane. As such, the development is contrary to the requirements of requirements of policy CP24 of the Tonbridge and Malling Borough Core Strategy (2007), policy SQ1 of the Tonbridge and Malling Borough Managing Development and the Environment DPD (2010) and paragraphs 127(c) of the National Planning Policy Framework (2019).

3. The National Planning Policy Framework 2019 (NPPF) aims to protect species of significant conservation importance in England (in this case bats), as covered by wildlife legislation, NPPF, national and local Biodiversity Action Plans (BAP's) and Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Local planning authorities have an obligation to protect such species and are also required to seek opportunities to promote and enhance biodiversity in accordance with the above legislation, policies, and plans. Please see Appendix A which shows a bat roost in a tree on the proposed site.

4. The protected species survey shows various bats reported on site and the proposed mitigation for destroying their places of rest and shelter. The protected species receive UK and European protection under regulations and the Wildlife and Countryside Act (WCA) 1981 (as amended). This protection means that bats and dormice; and their places of rest and shelter, are a material consideration in the planning process. This proposed development would cause unacceptable harm to the bat population. Furthermore, there are no acceptable measure proposed that would mitigate the harm that would arise.

5. Dormice are protected by EU and UK legislation; as well as UK planning policy and without mitigation, the removal of suitable dormouse habitat to facilitate the development would result in an offence. Kings Hill Parish Council strongly object to the proposed mitigation measures to be undertaken under licence due to there being no acceptable measures proposed that would mitigate the harm that would arise.

6. All our native reptile species inclusive of adder *Vipera berus*, grass snake *Natrix helvetica*, slow-worm *Anguis fragilis* and common lizard *Zootoca vivipara* are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to intentionally kill, injure or sell native reptile species (i.e., Sale, barter, exchange, transporting for sale and advertising to sell or to buy). Kings Hill Parish Council strongly object to the proposed mitigation measures to be undertaken due to there being no acceptable measures proposed that would mitigate the harm that would arise.

7. The recommended habitat layout, results in a net loss of 10.54 (-40.63%) habitat units and net gain of 0.58 (+ 100.00%) hedgerow units. This 100% increase in hedgerow equates to 4 hedgerows which does not “maximise opportunities for achieving net biodiversity gains” so therefore is not in line with Policy LP14 (c).

8. The loss of biodiversity units is set to be offset by off-Site enhancements under a Section 106 agreement, with the details to be provided prior to the commencement of works. This is wholly unacceptable. NE3(2) states proposals for development must make provision for the retention of the habitat and protection of its wildlife links. Opportunities to maximise the creation of new corridors and improve permeability and ecological conservation value will be sought. This must be within the development and not off-site enhancements.

9. The proposed development will have a negative effect on the tranquil area. The result of the development will mean a loss of visual amenity, the veteran trees contribute to this amenity and local landscape character. The woodland forms an important backdrop to the current development at Kings Hill and it is an important area for wildlife and biodiversity. This area has been ‘taken back’ by mother nature and has remained undisturbed for 50 plus years since it was last occupied by the Ministry of Defence. The cumulative effects of pollution on health, living conditions and the natural environment will be too high for this area which is a valuable local amenity. As such, the development is contrary to the requirements of paragraph 180 (b) of the National Planning Policy Framework (2019).

10. The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to preindustrial levels.

Local Planning Authorities should be focusing on long-term planning and development priorities, providing a vision and direction for future developments. This planning application is in contrast to the Paris Agreement priorities.

11. Kings Hill Parish Council are aware of the Tonbridge & Malling Borough Council recently adopted climate change strategy and action plan and would request that this application follows the requirements of these documents.

12. The proposed development is not exceptionally justified, and the compensation/ mitigation measures cannot re-establish or enhance the nature features that will be lost. As such the development is contrary to the requirements of Policy NE2.

13. Kings Hill Parish Council would refer you to the England Tree Strategy which focuses on expanding, protecting and improving woodlands, the woodlands help combat climate change and recover biodiversity. This planning application is not in agreement with the tree strategy as it eradicates woodland and contrasts with what the England Tree Strategy is trying to achieve. If the threats facing our woods and trees are not tackled it will severely damage the UK's ability to address the climate and nature crisis. Wildlife havens are suffering, and problems are being stored for future generations.

<https://www.theplanner.co.uk/news/uk%E2%80%99s-native-woodlands-in%E2%80%98poor%E2%80%99-ecological-condition>

<https://www.bbc.co.uk/news/science-environment-56738428>

TMBC Core Policy

14. The proposed development by virtue of the form and design of the vehicular and emergency accesses would significantly erode the prevailing character of the site and its immediate surroundings and introduce urbanising features which would cause visual harm to the appearance of the site and locality. The development proposed is therefore contrary to the requirements of policy CP24 of the Tonbridge and Malling Borough Core Strategy (2007), policy SQ1 of the Tonbridge and Malling Borough Managing Development and the Environment DPD (2010) and paragraphs 127(c) of the National Planning Policy Framework (2019).

15. It is felt that the proposed development will act as a conduit development to allow developers to continue building East with future applications. This must not be allowed as it would cause visual harm to the appearance of Kings Hill. There are concerns that developers are leaving a gap to the South East of the pathway for a future road. If houses are developed in this area residents are greatly concerned that the facilities paid for by Kings Hill residents will become over used by residents in neighbouring parishes who do not pay any management fees. This would be wholly unacceptable.

16. The proposed development would mean the felling of many established older trees. Long-term survival is key for trees because for them to be able to offset the greenhouse gas emissions humans generate, they need to live for at least 100 years. Replacing these trees with saplings is no compensation as the preservation of existing trees will have a more profound effect on slowing global warming in the coming decades, since immature trees sequester far less CO₂ than older ones. Further removing these trees is likely to cause an element of flooding in this area.

Emergency Access.

17. Kings Hill Parish Council note in Schedule 1, Section 2.7 of the Deed of Planning Obligation dated 2nd February 2004 where it states that there will be no direct motorised vehicular access between Wateringbury Road and Kings Hill and Teston Road and Kings Hill. Kings Hill Parish Council would ask the Local Planning Authority to ensure the enforcement of this restriction on access regarding the proposed access to construction vehicles via Ketrudge Lane.

18. The proposed application includes an emergency access via Kettridge Lane and Teston Road Wateringbury, Kings Hill Parish Council would draw your attention to the key outline planning permission granted in June 1990 by KCC, reference 90/1128/OUT includes two conditions governing access as follows:

Condition 33: No vehicular access to Kings Hill shall be made other than at the two access points on the A 228 West Malling Bypass and at the existing point on the A 228 except with prior approval in writing of the Highway Authority and the Local Planning Authority.

Condition 34: No vehicular access points shall be reopened without the prior approval in writing of the Local Planning Authority. Those provisions are also reflected in a Planning Agreement dated 12th June 1990 between KCC, the Borough Council and Rouse Kent (Planning Obligation).

In addition, there is a Planning Agreement prohibiting access to and from Canon Lane attached to planning permission TM/10/02234/FL granted on 19 May 2011.

Kings Hill Parish Council ask and expect the Local Planning Authority to ensure the enforcement of the restrictions on access recited in the foregoing itemised planning permissions. The reasons for the considered restrictions adopted by the LPA in the original planning permissions and Agreement have, since their adoption, only increased the necessity for their continuation and enforcement, and we ask for and expect the support of the LPA in considering the above application.

Wildlife Habitat Corridors.

19. The Woodland Trust talks of "Shelter belts" which they say provide food and habitat for pollinating insects, and are used as "highways" for bees, hoverflies, and other pollinators <http://woodlandtru.st/5MICJ> to roam between different regions. Others talk of wildlife corridors, habitat corridors, or green corridors and how these are equally vital for other species such as rodents and mammals (e.g. mice and deer).

Urbanization causes the loss of these natural habitats curtailing the ability of wildlife to roam freely between regions which prevents access to all of the resources needed to survive and isolates populations leading to inbreeding and reduced genetic diversity.

It is vital to retain all green corridors as they can mitigate some of the worst effects of habitat fragmentation however this proposed development will result in the destruction of a vital natural green corridor without any attempt to mitigate the damage it will cause to wildlife.

Please see Appendices B to F showing various aspects of the site.

Protected Species

20. On 30th July 2020 the first official Red list for British mammals highlighted species most at risk of national extinction in the near future – please see Appendix G.

The report was produced by the mammal society for Natural England and the joint Nature Conservation Committee.

It Confirms 11 of the 47 mammals native to Britain are classified as being in imminent risk of extinction. A further five species are classified as 'near threatened' meaning there is a realistic possibility of them becoming threatened with extinction soon.

The Hazel Dormouse and Serotine Bat are among the species listed as being at risk of extinction in Britain, placing them on the yellow risk level. Again, both species are present within the proposed site as per the ecology report produced by Tregothnan Estates.

The main reason for decline is loss of habitat, therefore the conservation of the rich bio-diverse proposed site is Imperative and should remain undisturbed for the survival of these all-important listed native mammals.

Crucially the red list of Great Britain has received authorisation on behalf of the International Union for the Conservation of Nature (IUCN) at regional level.

Meaning the threatened British species have been identified using the same robust, internationally agreed system that is applied to classify threats to spaces such as elephants and tigers.

21. Bluebells have been identified on the proposed site. The bluebell is protected by law under the Wildlife and Countryside Act 1981 and the parish council do not wish to see this protected species removed.

59531 Tower View SE

SA Objective 1: To improve human health and well-being

Significant negative (--?)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.

The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill Road network would result in significant disruption to that road network impacting on large numbers of the existing population.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Uncertain minor positive (+?)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negligible (0)/Negligible (0)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Negative (-)

The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Uncertain significant negative (--?)

The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Negative (-)

The site is greenfield land that contains a less than significant proportion ($< 25\%$) of Grade 1, 2 or 3 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant Negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA. However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Negligible (0)

The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.

59534 Tower View NW

SA Objective 1: To improve human health and well-being

Significant negative (--?)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.

The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.

SA Objective 2: To improve equality and access to community facilities and services **Significant negative (--)**

Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill Road network would result in significant disruption to that road network impacting on large numbers of the existing population.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Uncertain minor positive (+?)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the

area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negligible (0)/Negligible (0)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Negative (-)

The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost because of new development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Uncertain significant negative (--?)

The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely (>=75%) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Negative (-)

The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant Negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Negligible (0)

The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.

59544 Cellini Walk

SA Objective 1: To improve human health and well-being

Significant negative (--?)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.

The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of

development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to local residents. Access would need to be across a bridleway.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Uncertain minor positive (+?)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negligible (0)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Negative (-)

The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Uncertain significant negative (--?)

The site would result in the loss of a designated conservation area. Such building would radically change the nature of the area in a detrimental way.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site contains a heritage asset. The value of this asset would be essentially lost, even if the asset itself could be maintained, by building residential dwellings around it.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely (>=75%) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Negative (-)

The site is a conservation area that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant Negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA However, the conservation area currently contributes to the improvement of air quality in the area.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Negligible (0)

The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local

housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.

59547 Discovery Drive

SA Objective 1: To improve human health and well-being

Significant negative (--?)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.

The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to local residents. Access would need to be across a bridleway.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Uncertain minor positive (+?)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negligible (0)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Negative (-)

The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost because of new development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Uncertain significant negative (--?)

The site would result in the loss of a designated conservation area. Such building would radically change the nature of the area in a detrimental way.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site contains a heritage asset. The value of this asset would be essentially lost, even if the asset itself could be maintained, by building residential dwellings around it.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Negative (-)

The site is a conservation area that contains a less than significant proportion ($< 25\%$) of Grade 1, 2 or 3 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant Negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA. However, the conservation area currently contributes to the improvement of air quality in the area.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Negligible (0)

The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.

59634 Hoath Wood

SA Objective 1: To improve human health and well-being

Significant Negative (--)

Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.

Also, the KCC Strategic plans for cycle connectivity included a cycle route directly through the middle of this site, and this would be lost if the development proceeded.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

The site is placed within the Fair Accessibility Band. However, access would either need to be via the quiet lanes to the North of Kings Hill, or through the public open space that is currently used for soak-aways for the Kings Hill road network potentially resulting in more frequent flooding of the roads on Kings Hill.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites.

The site contains an existing green infrastructure asset that would be lost as a result of new development; much of the site is Ancient Woodland, and is bordered by more ancient woodland to the West. In addition, the site provides a wildlife corridor from the Warren Wood nature park and the ancient woodland to the North of Amber Lane through Warren Wood Ancient Woodland to Coalpit Wood Ancient Woodland. The effect of development would be devastating to the biodiversity in the area.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is located beyond the edge of a settlement. The site would be visible from the AONB of the North Downs and from points along the North Downs Way public footpath, reducing the character of the views. In addition, the development of the site would significantly and detrimentally change the vista from existing dwellings along the North edge of Kings Hill and many other dwellings with visibility in that direction.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Significant negative (--)/Negligible (0)

The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

Much of the site is Ancient Woodland. Most of the rest of the site is Grade 2 agricultural land. Although there was a small historic single storage location in its centre, that does not provide any justification for considering the site as a whole as brownfield.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Significant negative (--)

The destruction of a significant area of ancient woodland would reduce the capacity of the area to absorb Carbon Dioxide from the air. Even if the trees were replaced, it would be several decades before the level of absorption would reach the level provided by the trees that are there at present..

SA Objective 12: To protect and improve air quality

Uncertain Negative (-?)

The site is not within 100m of an AQMA. However, any access to the North would be via quiet lanes, and road traffic would impact on the safety and air quality of those lanes for recreational users.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Uncertain minor positive (+?)

Although the site is expected to comprise 100 dwellings or more, that would be dependent on the destruction of a significant area of ancient woodland. If the ancient woodland was avoided, the number of dwellings would be much less than 100, and there would be restrictions in the mix of sizes, types and tenures.

59655 Teston Road

SA Objective 1: To improve human health and well-being

Negative (-)

Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.

SA Objective 2: To improve equality and access to community facilities and services

Negative (-)

The site is in a poor accessibility band. The primary access is via the Teston Road and either via Wateringbury Road through East Malling or Red Hill via the Wateringbury traffic lights, both of which have traffic issues.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development

The site contains an existing green infrastructure asset that could be lost because of new development. The site is greenfield in a Green Belt area.

The site provides an open wildlife corridor joining the woods of Warren Wood and Cattering Wood. Loss of this important link would result in the deterioration of both sites.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Uncertain Negative (-?)

The site is located outside of a settlement. One of the few public footpaths and public roads skirts the site and are used for recreation; development will significantly impact the visual amenity of what is currently a rural vista.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)/Uncertain Negative (-?)

The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.

The site does not contain a water body or watercourse but falls within or partially within Source Protection Zones 2 and 3. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use. Primary access is expected to be via the Teston Road, and from there either via East Malling or Watlingbury, either of which will result in additional traffic issues for those areas

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negative (-)

The site is not within 100m of an AQMA. However, the increase of traffic on the Watlingbury Road associated with this development will impact the AQMAs on the A20 and at the Watlingbury traffic lights

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Uncertain Significant positive (++)

The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, the site is not sustainable, given the transport links and access to a service centre, and hence the practicability of the site is in question.

59884 Tower View NE

SA Objective 1: To improve human health and well-being

Significant negative (--?)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.

The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill Road network would result in significant disruption to that road network impacting on large numbers of the existing population.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Uncertain minor positive (+?)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negligible (0)/Negligible (0)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill

as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Negative (-)

The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost because of new development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Uncertain significant negative (--?)

The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely (>=75%) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Negative (-)

The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant Negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA. However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures

Negligible (0)

The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wide a mix of housing or make as great a contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.

Downs and Mereworth

59752 East of A228 South of Lapins Lane

SA Objective 1: To improve human health and well-being

Minor positive (+)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be considered. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption

that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.

SA Objective 7: To protect and enhance the cultural heritage resource

Significant negative (--)

The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.

SA Objective 8: To protect and enhance the quality of water features and resources

Significant negative (--)

The site is either entirely or significantly (i.e., >=25%) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding.

The site contains a water body or water course or falls within or partially within Source Protection Zone 1.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions to minimise climate change

Significant negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Significant negative (--)

The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland

SA Objective 12: To protect and improve air quality

Significant negative (--)

The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Watlington is likely to be significant.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures

Significant positive (++)

The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.

59755 Seven Mile Lane

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59758 North of Kent Street

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59759 North of Kent Street

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59760 South of Kent Street

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59761 Kate Reed Wood

SA Objective 1: To improve human health and well-being

Minor positive (+)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be considered. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.

SA Objective 7: To protect and enhance the cultural heritage resource

Significant negative (--)

The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.

SA Objective 8: To protect and enhance the quality of water features and resources

Significant negative (--)

The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.

The site contains a water body or water course or falls within or partially within Source Protection Zone 1.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Significant negative (--)

The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland

SA Objective 12: To protect and improve air quality

Significant negative (--)

The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Watringbury is likely to be significant.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures

Significant positive (++)

The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.

East Malling

59448 Bradbourne Park Road

Small site, no comment

59449 Carnation Crescent

Small site, no comment

59450 Bradbourne Park Road

Small site, no comment

59630 Fields North or Amber Lane

SA Objective 1: To improve human health and well-being

Significant negative (--?)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).

The site is within an area of open space that was originally provided by one of the parties developing the site, in-line with the description of the Site for the Phase 2 submission as agreed by the inspector. However, the site has been withdrawn by one of the parties developing the site, much to the disgust of the residents, with a fence, which is regularly vandalised, even though it was registered as an Area of Community Value. Indeed, the only planned access is via Warren Woods Nature Park, with the planned removal of trees, even though one of the parties developing the site has agreed a maintenance plan for the area, which would clearly be invalidated by turning some of the woods into a road.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

The site is placed within the Poor Accessibility Band. The access would be via Amber Lane which is not wide enough to support the number of dwellings that would make the site economically viable.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development

The site contains an existing green infrastructure asset that could be lost because of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.

The site is a major wildlife corridor joining the woods of Warren Wood and Hoath Wood. Loss of this important link would result in the deterioration of both sites.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. On appeal, the inspector rejected the appeal including the impact on the vista. The development would be out of character with the rest of Kings Hill and clearly not part of that development, being separated from it by an area of ancient woodland.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)

The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.

The site does not contain a water body or watercourse or fall within a Source Protection Zone.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land that is Grade 2 agricultural land. The area is designated by DEFRA as: Priority Habitat Inventory - Traditional Orchards (England) and, although one of the parties developing the site dug up all the apple trees, one of the options they suggested to the inspector at the Phase 2 planning appeal was that the area could be used as an orchard.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negative (-)

The site is not within 100m of an AQMA. However, the restricted access to the Kings Hill Road network will result in local areas of congestion which will impact on local residents. The existing increased numbers of residents in the area has resulted in increased traffic to the Kings Hill sports centre, and such traffic will impact on congestion for access to this site.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Uncertain Negligible (0?)

Previous rejected plans for the site included fewer than 100 dwellings. The impact on the environment outweighs the benefits gained from such a development.

Previous KHPC Objections to Site

- Kings Hill Parish Council object to this site being developed for the following reasons: -
Strongly object on the means of access to this site. Amber lane already suffers from on street parking which already has stopped an emergency vehicle from accessing this road. The on-street parking is clearly evident in the documents submitted and these appear to be a daytime photograph when the parking issue is minimal. The residents of Kings Hill feel that that the means of access should not be from Kings Hill as there would be a severe impact on the road network and therefore this application should be refused.

- This area is currently used as open space for dog walking and other recreation. The proportion of green and open space is linked to self-reported levels of health and mental health. The loss of this land has the potential to impact on the surrounding resident's wellbeing.
- There are significant concerns over the additional traffic that this site together with the other applications cumulatively will generate where accessed through Kings Hill. Even as phase three now begins to be built out and these proposed new sites, there are of course still only two means of access and egress for the ever-increasing number of residents. Whilst the A228 is dual carriageway between the main entrance/exit Tower View and either the A 20 or M20 which is where most traffic travels to and from, there are quite often significant difficulties in residents trying to leave Kings Hill in the mornings. The single carriageway A228 south towards Mereworth and Tonbridge and beyond is heavily used but often backs up. The traffic frequently blocks the exit out of Kings Hill, giving rise to prolonged traffic queues and all the cumulative wasted time as people seek to leave Kings Hill daily for employment off Kings Hill, or pursuit of leisure activities. We attach photos for the mornings of 12th September 2018, 18th October 2018, 19th December 2018, and 6th March 2019. Such is the issue the Parish Council have for some time been seeking amelioration arrangements through contact with our county councillor and KCC highways. These issues currently exist and were highlighted to us by residents at our recent public meeting as well as being referred to in some of their objections; phase 3 is already expected to add to the problems and we raise concerns over any further development eventually leading to further gridlock.

Paragraph 109 of the National Planning Policy Framework 2018 states

"Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road networks would be severe".

It is felt, and the attached pictures show, that the cumulative impact of more houses will have a severe impact on the surrounding road network. The existing number of houses already creates gridlock. This is a material planning consideration that will create major highway issues due to increased traffic generation and vehicular access.

Kings Hill Parish Council and Mereworth Parish Council have employed a consultant to undertake a highway appraisal in respect of the local plan. The comments within the report are pertinent to this application in respect of any further housing numbers and their effect on the road network.

- The Local Plan's assessment fails to recognise that the width of A228 Malling Road in the vicinity of its junction with Kent Street is unable to cope with the existing traffic flows on the route and the additional traffic that will be generated by the proposals for additional housing will exacerbate congestion and poor highway safety.
- There is no feasible or realistic solution to widen or improve A228 Malling Road to accommodate the additional traffic that will be generated.
- The significant impact from the proposed developments in terms of capacity and congestion and highway safety cannot be cost effectively mitigated to an acceptable degree.
- The proposals have therefore been prepared by a strategy that fails to meet the infrastructure requirements and cannot therefore satisfy the National Planning Policy Framework (NPPF) requirement for soundness, as required by the Ministry of Housing, Communities and Local

Government. The NPPF states that "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed" , there appears to be minimal if any mitigation for transport.

- We note the proposal to provide further traffic lights to the Tower View/Ashton Road roundabout, however these are shown as being installed on the Tower View exit arm. Rather than assisting residents leaving Kings Hill, this is likely to further restrict egress. What is required instead is a means of leaving the exit clear so that exit from Kings Hill is as unhindered as possible.
- Similar queuing occurs at the Tower View/Kings Hill Avenue roundabout in the mornings where the incoming business traffic has priority. There are often several cars queuing on the Tower View arm heading north to exit Kings Hill and on the exit arm of the new unnamed road through phase 3, similarly queuing to exit Kings Hill. Phase three has yet to be built out and occupied and hence this situation can only get worse, without calculating the additional effect of these latest proposals. The parish council feel there already a need for traffic light signalling to balance priorities and improve traffic flow in and out of Kings Hill.
- We note from the traffic assessment that it is deemed from data collection and software modelling that there will be minimal queueing because of this new application. This appears incongruous with resident's current experience, and we raise concerns that there appear to be little, if any proposals for mitigation. The parish council is aware that this roundabout is to be the subject of a traffic assessment review during the build out of phase three, but already raises concerns that this may conclude a similar result that no mitigation is required, despite residents existing concerns and issues.
- One of the greatest concerns is the lack of accessibility of GP doctor appointments. Kings Hill parish council have been working with the West Malling Group Practise to try to improve accessibility and availability for residents, following concerns raised. The situation is already considered to be seriously oversubscribed; indeed, the practise is no longer accepting direct applications for new patients. As stated above, this situation is already occurring, before the 635 homes from phase three are built and occupied. The documents highlight that there are only 10 FTE GP's for the 20,616 residents registered with West Malling Group Practice, although West Malling Group Practice have informed us that the current number is actually 6 FTE. It states Watringbury have 11 doctors for 7,716 people and 9 doctors at Thornhill Medical practise for 14,113 patients. Despite such limited provision already for the residents of Kings Hill, the documents suggest there will only be a moderate adverse impact on the medical service and make no clear offer of mitigation. The West Kent Clinical Commissioning Group have stated the mitigation required which the parish council wholeheartedly support, if TMBC are minded granting consent. The parish council are keen to see the majority of this contribution being for the West Malling Group Practise to improve the current poor ratio and also allow residents from the new areas to register and therefore have a doctor's surgery within walking distance.

Paragraph 8(b) of the National Planning Policy Framework 2018 refers to

"To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support health, social and cultural well being"

This application is not socially sustainable for the low number of doctors per resident as detailed above. This is before the number of houses proposed for the local plan and this application.

The parish council and residents alike are concerned over the impact on the local infrastructure. Kings Hill has been designed to be attractive to young families and has proved very successful and popular in this respect. However, although there is reference to preschool provision within the documents, the parish council is aware of the severe over subscription of pre-schools and the preschool attached

to the community centre is full and has a waiting list of 95 for 2019. The parish council seeks a contribution be provided for preschool, if TMBC are minded granting consent.

Although there are many secondary schools within an hour's travel radius of Kings Hill most are oversubscribed, and all require bus or private travel. The implication of this is increased traffic movements and expensive travel costs. This is a deficiency in a social facility and a contribution should be made towards a new local secondary school which would allow for sustainable travel and to meet the future needs of ongoing developments.

- There is reference within the submission that the emerging local plan should be disregarded on the basis it is not yet adopted. However, the creation and submission of the local plan has engaged with the local population who have been able to comment and provide their views with a view to shaping the plan. Whilst the plan is now for review with the allocated planning inspectors, it is deemed to be a material planning consideration now as it is a proposal for how the future should be shaped; to pay no regard at this interim stage would be contrary to the intentions of the local plan. This site is allocated as green belt in the proposed local plan.
- The parish council remains concerned that the applicant's advisers suggest expired consents for the previously consented business uses should be a material consideration. Kings Hill is significantly more developed than it was at the time such consents were granted and it is requested that the conditions of today afford greater weight than expired consents of the
- The secondary means of access for emergency/fire fighting vehicles is noted. Kings Hill Parish Council raises significant concerns over the route through existing heavily congested roads to the proposed emergency access serving application site 5.4 and questions its viability. Furthermore, there is significant concern that this route is to pass through and, in its creation, inevitably destroy areas of ancient woodland which should be preserved in perpetuity for the benefit of current and future generations.
- Residents fear that this application would have an adverse impact on nature conservation interests and biodiversity opportunities by being so close to ancient woodland. This is a material planning consideration and should be considered. Not only would you have loss of open land but there would be indirect violations such as lights and noise and habitats will suffer.
- There are several references to sustainable transport and good links to public transport. However, some of the sites are some considerable walking distance from the bus stop and the railway station is a considerable walk. Whilst there are some frequent bus services, this does not typically apply off peak or evenings and weekend when there are considerably less or no services. The implication of this is that car ownership is virtually essential for residents of Kings Hill, which gives rise to increased car travel and need for sufficient parking.

59631 Heath Farm, Wateringbury Road

SA Objective 1: To improve human health and well-being

Negative (-)

Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both), the only vehicular access to the facilities is along a route which is in excess of 10 miles round-trip. The open fields that had been provided as part of the Warren Woods nature park, including this site, have now been identified as potential development sites. The site overlaps the recently-created trim trail, which would need to be re-routed to allow for this development.

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

The site is placed within the Poor Accessibility Band.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Significant negative (--)

The site is within 800m of an existing secondary school or a primary school (but not both). However, only primary schools are provided, and the direct access is via unlit fields, unless going by car, which would be a round-trip of more than 10 miles.

However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health. In addition, the bus routes for school pupils do not currently support this location.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The location of this residential site means that transport to employment locations is largely through narrow roads that are limited in their capacity, restricting the opportunities for employment.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site contains an existing green infrastructure asset that could be lost as a result of new development. The location was identified by one of the parties developing the site in the Kings Hill Phase 2 submission as public open space with good connectivity to the public footpath network, and on appeal, the inspector agreed to the development on the basis that the development was in line with the descriptions provided for the use of Heath Farm.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. The location was identified by one of the parties developing the site in the Kings Hill Phase 2 submission as public open space with good connectivity to the public footpath network, and on appeal, the inspector agreed to the development on the basis that the development was in line with the descriptions provided for the use of Heath Farm.

SA Objective 7: To protect and enhance the cultural heritage resource

Uncertain significant negative (--?)

The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

SA Objective 8: To protect and enhance the quality of water features and resources

Negligible (0)/Uncertain Negative (-?)

The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.

The site does not contain a water body or watercourse but falls within or partially within Source Protection Zones 2 and 3. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Negative (-)

The site is more than 800m from a railway station and more than 400m from a bus stop and cycle route.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Significant positive (++)

The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs.

Previous TMBC Objections to Site

TMBC consideration for this site was rejected with the justifications:

1. The proposed development by virtue of the overall number of units proposed, the resultant

density, form, pattern, and character that would subsequently arise would be entirely at odds with the prevailing character of the environment, which is rural in character and appearance. As such, the development would be harmful to visual amenity and demonstrably would not respect the site and its surroundings, protect, conserve, or enhance local distinctiveness, be sympathetic to local character and history, or take any opportunities for improving the character and quality of the area and the way it functions. The development proposed is therefore contrary to the requirements of policy CP24 of the Tonbridge and Malling Borough Core Strategy (2007), policy SQ1 of the Tonbridge and Malling Borough Managing Development and the Environment DPD (2010) and paragraphs 127(c) and 130 of the National Planning Policy Framework (2019).

2. The proposed development by virtue of its specific nature and the locational characteristics of the site does not contribute to the objectives of sustainable development. The site would be separated from local amenities, facilities and public transport routes and the proposed development makes no provision to provide acceptable or safe connections between the site and such facilities in a way that would offer future residents a genuine choice of sustainable transport options. The development therefore fails to meet the objectives of sustainable development as set out by Tonbridge & Malling Borough Council paragraph 8 and the requirements of paragraph 102 and 103 of the National Planning Policy Framework (2019)

Previous KHPC Objections to Site

18/03032/OAEA Heath Farm Wateringbury Road East Malling West Malling Kent Outline Application: Redevelopment to provide up to 40 Class C3 residential units, together with landscaping, open space and other associated works. All matters reserved for future approval except for access (site 5.5)

Kings Hill Parish Council object to this planning application for the following reasons: -

- The Heath Farm, Wateringbury Road site would be contrary to the prospective new local plan, as this site is within a proposed extension to the green belt. This is classed as a material planning consideration and should be considered. There is reference within the submission that the emerging local plan should be disregarded on the basis it is not yet adopted. However, the creation and submission of the local plan has engaged with the local population who have been able to comment and provide their views with a view to shaping the plan. Whilst the plan is now for review with the allocated planning inspectors, it is deemed to be a material planning consideration now as it is a proposal for how the future should be shaped; to pay no regard at this interim stage would be contrary to the intentions of the local plan.
- The Kent Design Guide states “Developments should be permeable and linked to the surrounding network, allowing safe, direct routes for pedestrians and cyclists”. With the access to this site being on the Wateringbury Road the surrounding road and path network to anywhere other than Kings Hill does not offer a safe route which is a specific requirement. There will be access via Kings Hill for bus services but this is not the quickest most direct route therefore this would force people back into their cars to a failing road network. If you arrive at Kings Hill from this site you are a long way from the facilities in the centre.
- Paragraph 109 of the National Planning Policy Framework 2018 states “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road networks would be severe”. It is felt that access via Wateringbury Road would have a severe impact on the surrounding road network.
- Sustainable Transport. Paragraph 104 states that planning policies should aim to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Vehicle journeys will be used heavily at this site due to its location. Its only accessibility is by foot to the Kings Hill network. There appears to be no other general bus services at this site.

- The parish council has challenged the travel plan for phase 3 due to the stated low numbers of traffic movement and low threshold of improvement target. We are concerned this low bench mark is not applied to this current application.

59636 Stickens Lane, Well Street

Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically next to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.

59673 Mill Street

Small site, no comment

59698 Clare Lane

Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.

59715 Wateringbury Road

Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.

59726 Wateringbury Road

Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.

59740 Broadwater Farm

SA Objective 1: To improve human health and well-being

Significant negative (--)

Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.

The site would be over the KCC strategic cycle route and hence prevent implementation, resulting on a negative impact on the wellbeing of existing residents of Kings Hill.

The site currently provides countryside for Kings Hill residents. The withdrawal of open space within Heath Farm by one of the parties developing the site has restricted the available options for Kings Hill residents, and further restrictions should be avoided.

SA Objective 2: To improve equality and access to community facilities and services

Negative (-)

The site is placed within the Fair Accessibility Band. Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a round-trip distance of around

5 miles, so even though the site is physically next to Kings Hill, it is not strategically connected to it.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Significant negative (--)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on the site, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health. Adding a further stop for students in this site would further increase journey times increasing the issues.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development

The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.

As determined in the previous Local Development Framework, the site is a major wildlife corridor joining the East Malling Heath and beyond to West Malling and beyond. Loss of this important link would result in the deterioration of wildlife in the overall area.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is located next to several small villages, and its implementation would result in a complete change from a rural area with villages to a continuous urban sprawl from Maidstone to West Malling and beyond. This would be a complete change of the character of the whole area from villages in a rural environment to urban sprawl and should be avoided. In addition, the value of conservation areas in the site would be largely lost.

SA Objective 7: To protect and enhance the cultural heritage resource

Significant negative (--)

The site is located within 250m of a heritage asset. These would be severely reduced in value by development. These include the Cwylla, the searchlight and generator buildings from the second world war, and land anchors for the previous hop fields as noted in the deeds for the area.

SA Objective 8: To protect and enhance the quality of water features and resources

Significant negative (--)

The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.

The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. The water from the site drains into an area where it is extracted, and pollution from development would impact on the quality of the extracted water

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Negative (-)

Most of the site, including the areas where the developer previously indicated that the dwellings would be built, is more than 800m of a railway station. There are multiple areas of concern regarding how the site could be effectively linked into the road system without impacting on quiet lanes and further work is required before this site should be considered for progressing further with regards to viability.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Negligible (0)

The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.

SA Objective 12: To protect and improve air quality

Negligible (0)

The site is not within 100m of an AQMA. However, the major road networks: the A20 and M20 are both subject to AQMA and additional traffic from this development would impact significantly on those links.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures

TBC

Previous KHPC Objections to Site

Kings Hill has been described in the past as a beautifully created 800-acre development, providing a fully established mixed-use community creating the perfect balance between working & living. The Statement of Community Involvement in the planning submission shows that the vast majority of residents are strongly opposed to the Broadwater Farm plans in every aspect.

The proposed development is unsound in that it has not adequately considered and assessed reasonable alternatives, should not be on green field and use of the green belt land should be only in the most exceptional circumstances.

As documented in the withdrawn local plan, Kings Hill alone has provided roughly 25% of the requirement for new dwellings for Tonbridge and Malling Borough for roughly the last 20 years.

Kings Hill Parish Council recommends that planning permission is **NOT GRANTED** for this development for these reasons and those outlined below.

Road Network and Access

The Parish Council believes that the plans for the Broadwater Farm development are unsound based on the impact on the highway network:

- Berkeley proposal acknowledges that “the existing and proposed roads within Kings Hill are inadequate...”.
- Proposed access is through the green belt
- Traffic issues highlighted by KHPC for Phase 3 are unresolved & Kings Hill still set to grow by a further 1000+ dwellings before Broadwater development
- The connectivity with quiet lanes will result in increased traffic along those routes and make roads unsafe for walkers, cyclists, other road users and create congestion in surrounding villages
- Access to and from the proposed road junction exit onto the A228 from Broadwater development pose serious road safety concern including cutting across the cycle way. (There have already been two deaths on the A228 at the junction of West Malling train station).
- Layout increases the number of roads to cross when going to the station by foot or cycle, from three to six, which will result in increasing car usage.
- No significant central resources in the new development, necessitating use of Kings Hill’s facilities and approx 5 mile round trip by car
- Additional lorry movements are expected from the Blaise farm extension
- Additional traffic from the 900 dwellings in the Broadwater Farm development
- Additional traffic from the approved development around the “Startled Saint” site
- New and existing roads needing to support HGV traffic

Public Transport

- Indicative plans show road design discourages use of the railway station, even though an estimated 15% of residents would be commuting by rail, and, for bus users, given the diversionary route compared to the existing bus routes, would result in significantly increased journey times for other passengers in the area. Bus services already require continual subsidies to be viable, and this development would impact on long-term sustainability.

- Lack of sufficient bus or rail network connections with standing room only on train services to London and some school buses. Commuters have been forced to drive to other stations including Snodland, Ebbsfleet, Eltham, Mottingham and North Greenwich, to pick up better services adding to congestion and air pollution

Pedestrians and Cyclists

- Connectivity to Kings Hill is dependent on routes that are not in current reserved matters planning submissions and result in journey times and distances that will clearly not be used by residents, who will rely more on vehicular transport
- The continuous footpath / cycleway along the A228 from Kings Hill to the link road to the A20 will be broken by the proposed junctions and will increase the number of roads to cross for cyclists and pedestrians going between Kings Hill and West Malling station, bringing the total to eight from three.
- The network of 'Quiet Lanes' North of Kings Hill were intended to provide access for walking and cycling but the proposed development means that the planned for access to open space for Kings Hill residents is being removed.

Residential Parking

- Kings Hill Parish Council believes it is critical that the learnings from Kings Hill are not lost; the allocation of on-street parking for visitors is a particular concern.

Housing Density

- Housing density appears to be concentrated in specific areas increasing the apparent density and potentially resulting in issues between residents.
- There is too much of a dichotomy between open development and intense development
- The area has already significantly exceeded the local plan framework requirements through speculative development
- There is already a disparity between the plan and the submission (800-900 dwellings) and the requests to the power authorities (1350 dwellings) without any indication as to how the infrastructure will be updated to meet the requirements of residents.
- The plan does not consider the long-term needs of the area, failing to provide a vision of the next 30 years which would be in line with the NPPF paragraph 22 for an extension to an existing developed area.

Schools

- Failure to integrate properly with local housing would result in most of the pupils requiring vehicle journeys to access; most of a 1200-pupil secondary school would clearly come from outside of the new development. In addition, there are safety concerns regarding splitting the school's area across a road.

Retail

- Retail has not been included, resulting in the requirement for excessive road journeys with typically a five-mile round-trip to neighbouring areas; the nearest two areas: Kings Hill and West Malling,
- Kings Hill Parish Council suggests that no development should proceed without adequate consideration for retail infrastructure, including shops, restaurants, and coffee shops.

Infrastructure

- Infrastructure, such as doctor's surgeries, have not been adequately considered; the space allocated for a surgery is unlikely to be taken up as it is not economically viable for a population of 2000 either as a surgery or a branch surgery.
- The proposed development is not self-contained and relies on resources in neighbouring areas with no retail centre, with significant shops, restaurants, coffee shops, banks, pubs, post office, dentists, hairdressers and the like.

- The application states “land for a medical centre, primary and secondary school”. Clarification is required as to whether a primary and secondary school will actually be built, how large they will be, and whether the local education authority can afford to open and run them.

Telecommunications

- The current telecommunications infrastructure is creaking under the load of the existing housing and is expected to deteriorate further as more houses are built in Kings Hill itself. Additional dwellings will make the situation worse with higher contention for broadband and mobile services.

Play Areas and Youth Facilities

- Assumptions are made that play areas and youth facilities will be largely provided by surrounding areas that are already inadequately provided for.

Community Buildings and Spaces

- There is no community centre or other central community area provision relying on the already over-subscribed Kings Hill community centre
- The use of a SUDS facility in the proposed village green means that it cannot be effectively used for community use.
- Kings Hill Pre-school and Nursery on the Hill provide pre-school places and are oversubscribed.

Heritage

- Heritage has not been properly considered. There are features that are historic, such as the Cwylla and other features that appear to relate to structures from the second world war. • Kings Hill Parish Council believes a more in-depth archaeological investigation should be performed before any development is considered.

Open Space

- Open Space calculations are unclear; the provision of an area for increased biodiversity crosses a public footpath and, being on the other side of the A228, is not within appropriately short walking distance for most dwellings.

Environment and Visual Amenity

- Kings Hill Parish Council regard this as an unsustainable plan owing to failure to consider the environmental impact properly and thereby protect the environment.
- Loss of Grade 1 arable land unjustified.
- Isolation of ancient woodland directly affecting its health and diversity and resulting in deterioration and potential loss of these important resources.
- Removal of trees subject to TPO.
- Loss of secondary route for wildlife between green corridors as shown in The Local Plan adopted 2007
- Unacceptable impact on visual amenity for the area, with development being visible from all sides of the valley, with no significant plan to shield the development, contributing to the urbanization of the area.
- Significant and irreversible reduction in levels of biodiversity. Area has vast and long-established biodiversity and is not a monoculture as Berkley claim. Britain has an average of about 50% of its biodiversity left, far below the global average of 75%. A figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.
- Development of greenfield land will result in potential adverse impacts on surrounding wildlife and habitats.
- The proposed Broadwater Farm Development will have a heavy impact on the Air Quality in and around Kings Hill Development because of the proximity of the proposed Development.

- Massive increases in vehicular travel inconsistent with climate change initiatives.
- Serious concern regarding pollution of water used for extraction if drainage, water courses and the proposed ponds to handle surface water are not appropriately planned or managed.

Conservation Areas

- There are two conservation areas within this area which are popular with walkers, cyclists, and horse riders. The proposed development will harm environmentally sustainable landscapes, natural habitats, and tranquil areas.
- Impact on the New Barn conservation area and the listed buildings in the development and the two access roads is not justified.
- Proposed development area now includes the conservation area infringing on the proposed extended metropolitan green belt.

Protected Species

- The Berkley submission acknowledges protected species in the area but provides no plan for ensuring their future viability. Loss of the following identified species amongst others: Great crested newts, Reptiles (three species), Bats (seven species) and Badger.

Sustainable Farming

- Taking the highly productive area out of farming will result in the rest of the area being not sustainable as a fruit farm, meaning the total loss of that area of the greensand corridor.
- Loss of an established productive orchard. Orchards crucial to area and already in heavy decline.
- Food security is a serious issue since BREXIT and with global warming this development will destroy more than 20 years of farming.

Extended Metropolitan Green Belt

- Kings Hill Parish Council strongly supports the proposed extension to the metropolitan green belt, to ensure that there is a green lung for the excessively high density of housing in the area, and to ensure that the villages of Kings Hill, West Malling, East Malling and Leybourne do not coalesce.

Consistency of submission

- The Berkley submission appears to have inaccuracies and omissions that make it difficult to confirm whether identified requirements will be met.

Evidence

In July 2010 Kings Hill was stated as being 'the No 1 Place Making Exemplar Village' and 'the country's most successful new village' in a report by one of the world's leading property agents CB Richard Ellis Ltd, UK Residential Research & Consulting. In the same report Liberty Property Trust UK Ltd (LPTUK) was praised for reacting to the requirements of local and potential residents by matching the product accurately to their needs creating a clear sense of community pride. Kings Hill was described as a beautifully created 800-acre development, providing a fully established mixed use community creating the perfect balance between working & living. Unfortunately, the authors of the report failed to talk to the residents of Kings Hill, especially those living in the latest phase known as Phase 2. Had they done so they would have known about the difficulties of living in Kings Hill and the significant failings of the development. This is being exacerbated by the Phase 3 and Phase 5 developments, which will already change the fundamental nature of Kings Hill in a detrimental way with their lack of strategic road structure and preponderance of 1- and 2-bedroom flats. This at the same time that there has been little development in the centre to provide a wider range of facilities. I.e., Kings Hill is already over-developed; it is now classified as Urban, but without the range of facilities that one would expect of an urban development, such as local shops, banks, department stores, multiple public houses, sports centre (e.g. badminton, squash, fitness equipment) market centre, or all of the facilities that bring a community together.

As documented in the withdrawn local plan, Kings Hill alone has provided roughly 25% of the requirement for new dwellings for Tonbridge and Malling Borough for roughly the last 20 years.

The proposed development is unsound in that it has not adequately considered and assessed reasonable alternatives. It is unknown whether any alternative strategies were considered as part of the strategic environmental assessment and sustainability appraisal.

Proposed Green Belt land should be protected. Exceptional circumstances for loss of Green Belt land have not been demonstrated.

There is not an equitable distribution of new houses across the borough. Proposed housing development should be spread more evenly across the borough and should be proportionate to the size of existing settlements and local infrastructure.

TMBC has not used the most up to date statistics and should use projected housing need figures from 2016, this would mean 2,000 less houses. The OAN of affordable housing should be updated and consideration should be given as to whether additional housing allocations, including rural exception sites, are required in order to meet this increased need.

The proposed Broadwater Farm development will exacerbate many of the issues in Kings Hill while providing solutions to none of them.

This area has ALREADY SIGNIFICANTLY EXCEEDED the proposed obligations for the 2021-2031 timeframe with regards to agreed housing development, with very little additional infrastructure over that developed for Kings Hill Phase 2 and further development as proposed is not justified.

Consideration needs to be given as to whether it is a reasonable prospect of a 5-year plan or 10-year plan for housing supply in the borough. It has been stated that TMBC are actively working on a new local plan, and it is expected that will be agreed by the time that the building for the existing planning consents for the area have been completed, i.e., there is no indication that there is a lack of housing supply for this area. An important consideration is whether there are alternative locations for additional housing to meet the obligations of the whole borough, and the failure of that work is not justification for more than doubling the quota of housing for this area of Tonbridge and Malling. In addition, recent case law provides guidance that the absence of a five-year supply is not justification for uncontrolled development.

The plan does not consider the long-term needs of the area, failing to provide a vision of the next 30 years which would be in line with the NPPF paragraph 22 for an extension to an existing developed area. There is already a disparity between the plan and the submission (800-900 dwellings) and the requests to the power authorities (1350 dwellings) without any indication as to how the infrastructure will be updated to meet the requirements of residents.

Road Network and Access

The Parish Council believes that the plans for the Broadwater Farm development are unsound based on the impact on the highway network:

- The new proposed road junction onto the A228 from the proposed Broadwater Farm development poses serious road safety concerns. There has already been two deaths on the A228 at the junction of West Malling train station.
- The current road infrastructure has insufficient capacity to cope with the traffic generated by proposed development.
- Potential traffic increases on Ashton Way during the proposed development timeframe:
- Kings Hill will grow by 700 dwellings (Phase 3) and 350 dwellings (Phase 5) adding to the traffic to /from Kings Hill.
- Additional lorry movements are expected from the Blaise farm extension.
- There will be additional traffic from the 900 dwellings in the Broadwater Farm development.
- There will be additional traffic from the approved development around the "Startled Saint" site.
- Access from Broadwater Farm residents to access the retail district in Kings Hill.

Roads integrate with the existing road network in a way that will disrupt flow on that network, and add to the congestion that is already present, even ignoring the increases that will occur through

agreed developments, such as Kings Hill Phase 3 and Phase 5, Forty Acres and King Hill. This is especially evident with regards to the A228 South of the Tower View roundabout, for example with Kent Street being further impacted by additional traffic. The failure to integrate with Kings Hill means that it will be essentially stand-alone, but without centralized resources. The connectivity with quiet lanes that is now proposed is not welcome as it will result in increased traffic along those routes; with new and existing roads both needing to support HGV traffic, it will be difficult to create crossings that adequately restrict access to the quiet lanes, impacting on the safety of pedestrians in the area, and reducing the amenity value for Kings Hill residents, amongst others. Note that the objections raised by the Kings Hill Parish Council for the Kings Hill Phase 3 development with regards to roads have not been resolved and are issues that are getting worse as the number of dwellings in the area increases. Kings Hill Parish Council considers that an up-to-date traffic assessment, showing data in a clear and transparent manner, is urgently required, including the projected impact of ALL developments; the assumption for Phase 3 that residential traffic would be less of an issue than commercial traffic has not been adequately validated, never mind the impact of the later developments.

The transport assessment carried out by TMBC in 2017 shows that by 2031 the degree of saturation for the A228 and Tower View is acceptable. The Parish Council has deep concerns that this is inaccurate. In the 2011 census 76.8% of people travelled to work by car (Kings Hill, Wateringbury, West Peckham, Mereworth). With the proposed housing at Borough Green Gardens and Broadwater Farm should this percentage continue or increase (due to the lack of suitable bus or rail network connections) the intensification of traffic would far outweigh the capability of this road network.

This is exacerbated when there is an accident or incident that takes place at any point along the A228, A20 or M20. This happens on a regular basis; the incident on the A228 on 25th April 2018 caused the entire area to be gridlocked for 8 hours.

For example, on 8th November 2019, due to a broken-down lorry and an incident on the M20, the journey from Tower View to junction 4 of the M20 took on average 1 hour. On 13th November 2018 a lorry had caught fire at junction 7 of the M20 and the journey from Tower View to junction 4 of the M20 took an average of 35 minutes. This journey should take on average less than 10 minutes. There are incidents of this kind on a regular basis despite the transport assessment stating the capacity of the Tower View/Ashton Way junction will be sufficient. With the proposed housing numbers stated in the Broadwater Farm development, this seems impossible.

The parish council would also emphasise that the proposed increase in housing will mean that many more cars will be using the M20 from junction 4, due to it being the strategic link between London, M25 and the channel tunnel/ ports. The motorway is already stretched at peak times between junctions 3 and 5 and the amount of housing that is being proposed locally is too great for the road and local motorway network. The extra housing will impact on traffic flow causing delays, congestion pollution etc.

In the traffic assessment TMBC agree that Malling Road/Gibson Drive junction is currently operating beyond theoretical capacity however the parish council has not seen any plans of how this is going to be addressed and has severe concerns for the movement of traffic in this area following the proposed development. If there is a link road directly between the Broadwater Farm development and the Kings Hill, the Berkley proposal acknowledges that this will be used as a rat-run for vehicles travelling South from the development, which is clearly totally inappropriate.

The Parish Council conducted its own traffic survey of cars leaving Tower View/Ashton Way junction several years ago. This showed an average of 750 cars leaving between 8am and 9am. This does not include the already approved 600 homes currently being built in phase 3 and the proposed 538 homes being put forward in 'Phase 5' of Kings Hill by the developer which may be approved before the impact of the Broadwater Farm development is taken into consideration.

In the event of a significant development taking place on Broadwater Farm the Parish Council strongly believe that there should not be vehicular access to the A228, as each potential configuration has its own problems. For example, If there is a straight-through junction at the train station junction, that would enable easy access to public transport for commuting, but would result in the use of Station

Approach as a rat-run, impacting traffic in West Malling, East Malling and surrounding narrow country roads and increasing dangers for primary schools in the area. Alternatively, putting in a staggered junction while reducing the use of Station Approach as a rat-run would create difficulty for commuters getting to and from the station. This will be compounded by significant vehicular movement between the Broadwater Farm development and the existing Kings Hill Development as residents travel to and from the schools, shops leisure and health facilities. However, the current road layout in Kings Hill essentially precludes a direct link as designed road capacities within Kings Hill would not be adequate to meet the additional traffic; this is acknowledged in the Berkley submission. In addition, such roads would be from the extremity of the Broadwater Farm estate, meaning that some parts of the estate would have unacceptable levels of traffic, with the majority of people travelling from the larger part of the estate through a relatively small part of the estate. In addition, the requirement to provide secondary access to the estate is problematic if the A228 is not used as a direct connection point; access to the quiet lanes (Pikey Lane, The Heath etc) is inappropriate as these do not have good connectivity to major roads, and their use would result in significant danger to walkers, cyclists and other road users and cause congestion in surrounding areas such as West Malling, East Malling, Wateringbury and Teston.

It is inevitable there will be additional effect on the current traffic situation, it will, of course, be impacted, by the additional houses already planned on Kings Hill and exacerbated by the proposed development at Broadwater Farm. Currently, an incident on any of the aforementioned motorways can result in total gridlock across all three motorways coming into Kent and also heading in the opposite direction into London.

Opinion of Highways Agency figures must be at least 10 / 15 years out of date. They do not bear any resemblance to actual numbers of vehicles arriving and leaving Kings Hill currently for work on the Business Park. Phase 3 assumptions were that residential traffic would be less of an impact on roads than commercial traffic, but with the changing nature of work, it is debatable as to whether that assumption still holds true.

The junctions of the M20 and the A228 will not be able to cope with the increased traffic. The new proposed road junction onto the A228 from the proposed Broadwater Development poses serious road safety concerns. There have already been two deaths on the A228 at the junction of West Malling train station.

Current road infrastructure has insufficient capacity to cope with the traffic generated by proposed development.

The current [withdrawn] draft local plan shows the area being proposed for development as an extension to Kings Hill. However, the proposed access is through the area proposed in the current draft local plan as being green belt. This is not appropriate, given the visual and ecological impact on the area. Also, the travel distances to Kings Hill would result in distances of around 5 miles for each journey to retail facilities. West Malling is largely inappropriate for this, given the limitations on parking – even the available parking in the central car parks has been continually eaten away by infill housing developments, so as demand goes up due to developments in the area, availability goes down.

In addition, as well as the impact of the necessary works to install the junctions (there is no practicable alternative route for local traffic, as can be seen by the impact on the traffic jams through West Malling when the A228 was recently re-surfaced) the two proposed accesses onto A228 Ashton Way have serious shortcomings and should not be allowed.

The proposed junction for the primary access road is shown as offset from the opposite road to West Malling train station. During the evening rush hour, a noticeable queue can develop North bound at this junction with the current layout. If the proposed layout is adopted, the additional sets of traffic lights will further impede traffic flow, and because there is a space between the traffic lights on the primary access road and the Northbound traffic flow, that will essentially give the development effective priority over through traffic, additionally impacting traffic flow along the A228, possibly also temporarily blocking South bound traffic depending on traffic light sequencing, and seriously

impacting on the ability to get out of the West Malling train station to the Kings Hill estate. I note that an additional lane is being proposed with merging of the right-hand land immediately after the lights. This has been shown to be a dangerous configuration and has been removed in numerous places. (E.g. where New Road crosses the A322 at Bagshot). For example, drivers trying to turn right will have a track which crosses those drivers trying to quickly overtake a queue of vehicles in the second lane. The issue is not so serious at the Hermitage Farm lights, as very little traffic goes in and out of the farm, but there is likely to be a much higher level of traffic turning right at the West Malling station / Broadwater farm proposed development, and there is the potential for a disaster! The council strongly advises that this aspect of the proposed junction is not allowed in the interest of safety. In addition, there is a continuous footpath / cycleway along the A228 from Kings Hill to the link road to the A20. This will be broken by this proposed junction, with a convoluted path across three roads; depending on how the traffic lights are arranged, this could be incredibly dangerous. The layout increases the number of roads to cross when going to the station, from three to six, which is not a good approach, if you are trying to encourage people to reduce car usage! In addition, this junction creates a gap in the bund that is intended to shield the area, including Kings Hill and the New Barns and Broadwater Farm conservation areas (and others), which will increase the noise nuisance in these areas due to traffic on the A228. In addition, the proposed junction removes the access to the public footpath MR116A; with no indication as to how this access will be re-established.

The proposed junction for the secondary access road is shown as being on what is currently the fastest part of the Ashton Way in terms of typical vehicle speeds, which immediately impacts on safety. The access road makes a sharp turn to the Left and vehicles using the exit will need to be accelerating to be able to safely join the dual carriageway. However, the access road crosses the footpath/cycleway that goes along the A228. This access will increase the number of roads to cross for cyclists and pedestrians going between Kings Hill and West Malling station by a further two, bringing the total to eight, when it used to be three! In addition, the convoluted route that cyclists will need to use certainly makes the route between West Malling train station and Kings Hill much less attractive. This is in contravention to climate change initiatives, which are intended to reduce the reliance on car use and reduce the carbon footprint associated with travel. The secondary access road goes through the bund that provides sound protection to Kings Hill and the New Barns and Broadwater Farm conservation areas, which will further increase the noise nuisance for residents in these areas due to traffic on the A228. It seems that the developers are trying to minimize the width of this gap in the bund, but the result is poor visibility, especially for drivers using this route to leave the proposed development. This is a perfect storm, with tight corners, poor visibility and needing to accelerate to join the through traffic, meaning that pedestrians and cyclists attempting to cross this junction will be in significant peril. In addition, because the next roundabout North on the A228 is over 2 miles away, for a driver coming from the South to use this access (e.g., because of issues for the primary access) will involve over four miles round trip to get back to this location, and through six sets of lights (or more, depending on the updated layout of the primary access junction).

The proposed access into Kings Hill may have been workable when Kings Hill Avenue extended down to the Kings Hill Phase 2 residential area as a dual carriageway, but the new layout for Phase 3 essentially precludes this as an option, as the current road layout is not suitable for supporting more than the current Kings Hill population and possibly the additional dwellings for which outline planning consent has already been granted; the road width, roundabouts and traffic calming being totally inadequate for the increase in traffic that would result from including a link road at the proposed location. Indeed, the proposal acknowledges that "the existing and proposed roads within Kings Hill are inadequate...". This is exacerbated as there is no significant central resources in the new development, resulting in the primary requirement to use Kings Hill, for example for shopping, and it is too far to practicably walk, so most journeys would be done by car, typically multiple times per week for each household. In addition, the proposed link road would be immediately adjacent to ancient woodland (risking its health, when considering impact on root growth and isolation from other green areas) and though existing mature trees, further impacting on the visual amenity of the area. In

addition, the access route would be from a peripheral part of the proposed development, which would mean that car journeys between the new development and Kings Hill retail centre, schools, pick-up points etc, would also disproportionately impact on residents of that area as well.

In addition to the inadequacy of the proposed road links, it is considered that the building of such access points will cause major disruption, as was seen when the A228 was closed briefly for resurfacing works, and the alternative routes, such as through West Malling, became excessively congested.

M20 junction 4 and the A228 from the M20 to Kings Hill were extensively re-modelled in order to mitigate the previous phases of Kings Hill's development and to cope with the increased commuter traffic caused by the commercial park. No mitigation, however, was undertaken south of Kings Hill on the A228 between Kings Hill and Mereworth. This area is a regularly congested; residents of Kent Street often struggle to pull out onto the A228 in either direction due to the volume and speed of traffic; and Offham is regularly used as a rat-run by drivers trying to avoid the congestion. There is no entrance to Kings Hill from the east and there is strong opposition to such an entrance from the residents of Wateringbury, East Malling and Teston who fear the effects that increased traffic would have on their communities. Kings Hill residents would also suffer from an entrance in the east as drivers would then use the village as a cut through. It is noted that Well Street is signed as not suitable for HGVs. There are a number of farms, businesses and residences along The Heath; removal of the access via Pikey Lane will restrict the options for routes suitable for HGVs, which will result in increasing heavy traffic on the Wateringbury Road / Red Hill, or allowing connectivity to the proposed road network will result in other traffic using the link as a rat-run, which is counter to the constraints that have been applied to Kings Hill development and inappropriate for the roads in question; Wateringbury and East Malling could quickly become congested with traffic from the Kings Hill area, especially when there are delays around the A228, A20 and surrounding roads.

Public Transport

There is a lack of sufficient bus or rail network connections this can be evidenced by the fact that train services to London are standing room only and school buses to Tonbridge are taking up to 90 minutes with children being forced to stand.

Train Services

Train services to the city were cut in 2009 and many commuter residents either struggle with the existing services or have now found alternative but less convenient routes to their workplaces.

West Malling Train Station will also be heavily impacted. The train service is already at capacity and some passengers are having to stand all the way to Victoria Station, London and on the return journey during rush hour. West Malling station can only have 6 carriage trains because of short platforms. Trying to park in any of the current car parks is impossible after 8.30am [prior to COVID]. It is the same issue with other station car parks in the area. Together with large numbers of proposed residents needing to commute to London for their work, the trains are already very overcrowded in the rush hour without adding a few hundred more passengers and parking for their respective cars. If Local Government think that residents from the proposed Development are going to walk to the train station, they are greatly mistaken. The issues, as aforementioned, will be the mirrored at Paddock Wood Train Station, which is used by many residents within Kings Hill because of the fast trains into the City of London. Again, the service is outstripped by the sheer volume of passengers in the rush hour. So too are the car parks at Paddock Wood. The rush hour in this area starts at around 6.00am for London commuters and is still going strong with returning commuters at 7pm in the evening!

Many commuters have been forced to drive to other stations including Snodland, Ebbsfleet, Eltham, Mottingham and North Greenwich, to pick up better services thus adding to congestion on our already busy roads and increasing air pollution.

Bus services

Kings Hill was well served by buses during certain times of day however Kings Hill Parish Council (KHPC) has received complaints that buses are often full at peak times but empty off-peak. In the evenings and at weekend there is a very limited bus service. The service has become more limited since the cessation of some subsidies.

There have been significant issues with the bus service for school children, with some routes being unreliable and others being overcrowded. KHPC has received a copy of correspondence from a Maidstone school expressing concern about the children from Kings Hill because they are taking longer to get to school than children from further afield. The Broadwater Farm development would significantly exacerbate the current situation.

Buses have been allocated a temporary lay over area outside Asda on Tower View, Kings Hill's busiest and fastest road. Up to five buses at any one time can be routinely observed parked there. The temporary lay over area is dangerous for other drivers because buses restrict their view, dangerous for pedestrians because buses surround a busy crossing point from Asda blocking their line of sight and dangerous for cyclists because the cycle lane is routinely blocked. Additional bus traffic supporting the Broadwater Farm development will only make the situation worse.

Pedestrians and Cyclists

Non-motorized transport has not been properly considered, with connectivity to Kings Hill dependent on routes that are not in current reserved matters planning submissions and result in journey times and distances that will clearly not be used by residents, who will rely more on vehicular transport instead, increasing the traffic beyond that already estimated, and leading to additional congestion.

There is currently a network of 'Quiet Lanes' North of Kings Hill, which were intended to provide access for walking and cycling. These have not been much used in the past, as the completion of the connectivity to the public footpath network has been delayed until the relevant parts of Kings Hill have been developed in line with the original planning obligation. Now that these connections should shortly be in place for Kings Hill, the proposed development means that the planned for access to open space for Kings Hill residents is being rudely removed, just as it becomes accessible! Even where access is maintained, the character will be destroyed!

Residential Parking

Parking on many areas of Kings Hill is problematic owing to the developers' limiting spaces on more recent developments to 1.5 spaces per dwelling. The average number of cars per dwelling continues to rise, but even two years ago 58.9% of households on Kings Hill had 2 or more cars (Census, 2011). A new trend has emerged with combined car parking "courtyard" areas serving a group of properties, usually to the rear of the group of properties. This has caused considerable problems with neighbour dispute and increased garage crime as reported by the police. This trend of pushing car parking in to the background does not work and that has to be acknowledged and catered for in the proposal. Courtyard parking has also led to significant on-street parking with cars often straddling the road and pavement further constricting narrow roads, restricting access for emergency vehicles, and forcing pedestrians including young mothers with children, to walk in the road. It is critical that the learnings from Kings Hill are not lost: the allocation of on street parking for visitors is a particular concern.

Housing Density

Housing Density, although indicatively lower than the recent developments on Kings Hill appears to be concentrated in specific areas increasing the apparent density and potentially resulting in issues between residents as above we should learn from the issues already evident in Kings Hill.

There is too much of a dichotomy between open development and intense development

Schools

Primary Education

Three schools in Kings Hill provide primary education, Discovery School, Kings Hill School and Valley Invicta School. Many Kings Hill parents take their children to other local schools such as Mereworth, Offham and Wateringbury Schools. This is sometimes by personal choice but not always.

Secondary Schools

There is no secondary school provision on Kings Hill and KCC Education has stated that there are no plans to build a secondary school in or near to Kings Hill. All children over 11 have to travel by car or bus to schools in Maidstone, Tonbridge, and Tunbridge Wells.

The Broadwater Farm development is expected to include a necessary Primary school and a Secondary school. Primary schools generally have a small catchment area, so this makes sense, but secondary schools are often chosen for other reasons than locality and often have catchment areas of miles or 10s of miles. There will be additional school buses and coaches travelling to/from secondary schools across Tonbridge and Malling due to the expansion of Kings Hill and the Broadwater farm development. There will be additional school buses and coaches travelling to/from the proposed new secondary school in the Broadwater Farm development. Transportation of students to/from the new Secondary school from outside the new development plus transportation of students to/from the new development to Secondary schools outside the development will generate significant increases of traffic on the already heavily utilised Ashton Way (A228) during rush hour and late afternoon.

Retail

There is no retail space proposed in the current plans. That means that all such activity will either be on-line, with the associated plethora of delivery vehicles rushing around to meet their quota, or residents will be visiting other retail centres. However, the nearest such centres: Kings Hill and West Malling, already have issues with parking and capacity. Given that there is no direct road access to either retail centre, it is suggested that no development should proceed without adequate consideration for retail infrastructure, including shops, restaurants, and coffee shops.

The retail centre of Kings Hill, and provision of suitable retail outlets, continues to be problematic. The retail area is currently dominated by one supermarket to the detriment of independent retailers. Over the years, the failure rate of independent retail businesses has been significant. Residents have also recognised this, and that Rents are too high for some businesses to be sustainable. Nearby West Malling has a good range of mainly independent shops, but parking is extremely limited and deters many from shopping there.

Infrastructure

TMBC had not used the most up to date statistics in the withdrawn local plan, and should use projected housing need figures from 2016, this would mean 2,000 less houses. The OAN of affordable housing should be updated, and consideration should be given as to whether additional housing allocations, including rural exception sites, are required in order to meet this increased need.

The proposed development is not self-contained and relies on resources in neighbouring areas. For example, there is no retail centre, with significant shops, restaurants, coffee shops, banks, pubs, post office, dentists, hairdressers and the like. The nearest area is Kings Hill, but that is already struggling, even before the remainder of the Phase 3 dwellings have been completed or the Phase 5 development implemented, or the King Hill development completed, or the Forty Acres site developed, with shops in Kings Hill introducing increasingly tight parking restrictions (Waitrose car park is down to 1 ½ hours) and issues with parking on streets, significant problems getting doctors' appointments and dental appointments. The area has already been over-developed, meaning that there are no areas where increased resources can practicably be implemented. (E.g. a proposed Aldi

has less car parking spaces than a smaller one at Aylesford, and there do not seem to be any spaces for employees to park!) Parking has also been an issue for the West Malling train station; of course, the impact of Covid means that current utilization is less than it has been historically, but consideration should be included for long term recovery of train services.

The current health services available in Kings Hill, West Malling and Leybourne are poor; the availability of appointments is overstretched. The GP surgery in West Malling has been closed and there is no detail of any proposals to cope with the significant increase of the development in the proposed development. The doctor's surgery in Kings Hill has already closed its books to new residents and is unable to cope with the current residential demand.

The application states "land for a medical centre, primary and secondary school". Clarification is required as to whether a primary and secondary school will actually be built, how large they will be, and whether the local education authority can afford to open and run them. Being at the Northern extent of the proposed development, the location is not ideal for residents of Kings Hill as it will almost certainly mean that virtually all students will need to be driven to the school, which will put undue strain on the road network.

Note that, although there is a dire need for GP resources, it is unlikely that there will be a requirement for a surgery in the proposed development –West Malling Group Practice relatively recently closed a branch surgery in West Malling, concentrating on the other locations. The main issue seems to be getting enough GPs, and that seems to be difficult to achieve in the current climate. It is suggested that no further expansion of housing be performed in the area until the issue with availability of GPs can be resolved; this is a consideration supported by our local Member of Parliament, Tom Tugendhat.

Telecommunications

The current telecommunications infrastructure is creaking under the load of the existing housing, and is expected to deteriorate further as more houses are built in Kings Hill itself. Additional dwellings already agreed, will make the situation even worse with higher contention. This affects mobile signals, where there have been reports in social media indicating that people have issues with all of the mobile operators. In addition, the contention on the end-loop (connectivity between the telecoms boxes by the side of the road and the dwellings) means that classic broadband service can be problematic at times and in certain areas. This is impacting on the ability of home working and home businesses, which will increase traffic levels where wage earners are more dependent on private and public transport to travel to work. The addition of a further 900 dwellings without full consideration for the telecommunications infrastructure will result in severe impact on home working and businesses in the area.

Play Areas and Youth Facilities

The high birth rate in Kings Hill from its inception has in time led to a high level of young people living in the development. There are few facilities in Kings Hill for this growing age group. Kings Hill also attracts youth from nearby areas outside of the parish, such as the Airfield Estate to the west of the A228. Lack of facilities for this cohort is already causing anti-social behaviour among some. There are a number of highly popular organised groups in the area serving Kings Hill. Groups such as the scouts, cubs, beavers, brownies, guides and girls and boys brigade are oversubscribed. They meet in local village halls because there is no dedicated youth or scout building. There are currently two independently run youth clubs in Kings Hill.

The facilities for youth in Kings Hill is already woefully inadequate, and further residential development in the area will exacerbate problems.

Community Buildings and Space

The Kings Hill Community Centre is extremely popular and often demand outstrips supply. Parking for the community centre is insufficient for the number of hirers. The Centre car park is used by parents collecting children from Kings Hill School due to insufficient parking at the school.

The Kings Hill Pre-school and Nursery on the Hill provide pre-school places. Both are oversubscribed. However, given the infilling that has occurred on Kings Hill, there is no space to significantly extend these facilities to meet the requirements of a further 900 dwellings, and the absence of such resources in the plans leads to serious concerns.

Heritage

Kings Hill has a predominately World War II heritage as RAF West Malling airfield was based here. Many relics from World War II still exist in Kings Hill, there are other sites in the surrounding area that require proper investigation before any consideration for their use for housing is even started! As well as the identified historical structures, such as the cwylla and the listed buildings, further investigation is appropriate. For example, there are the remains of a building North of Kings Hill close to the proposed access point that may deserve investigation.

Access routes indicate that it is related to the airfield, with indications of a structure there in 1940.

Open Space

There are two conservation areas within this area which are popular with walkers, cyclists, and horse riders. The proposed development in Broadwater Farm will harm this and together with the loss of agricultural land may reduce the national long-term capacity to produce food in an environmentally sustainable landscape, natural habitats, and tranquil areas.

Environment and Visual Amenity

The Parish Council supports the proposed extension to the Green Belt in the area between West Malling and East Malling. This will ensure that a clear separation exists between the communities of West Malling, East Malling, Kings Hill and Leybourne. The Parish Council requests that an area of Green Belt surrounds Kings Hill to defend the quiet lanes network and provide a 'green lung' to the surrounding communities.

Development will be too visual on all sides. Unlike Kings Hill Development which is surrounded by mature trees and high shrubs. The report mentions the sunken lanes and the narrow lanes (some designated 'quiet lanes') should remain to be used by walkers / horse riders / cyclists. The idea of building bridges to accommodate cars is not practical. The current residents surrounding Broadwater Farm will have their day to day lives irrevocably altered and detrimentally changed.

It should also be noted, the enormous loss of agricultural land in recent years, yet again orchards which are crucial to the area and are in heavy decline within Kent. This land, the narrow greensand belt should be used for feeding the growing population of Kent.

Landscaping to include the already current fruit trees and fruiting shrubs which are intended to act as a screen for the proposed Development is indicated but no mention of who will be taking care of said trees and shrubs? Opinion is, this will not work.

Development of greenfield land will result in potential adverse impacts on surrounding wildlife and habitats. Here in Kings Hill, there are areas as designated above. Amber Lane has a wildlife 'park' which is inhabited by roe deer, badgers, various bird species including migrant birds (some from Scandinavia) / Hazel Dormouse / small rodents / butterflies / bees / insects all of which are important to the environmental health of the area. The proposed Broadwater Farm Development will have a heavy impact on the Air Quality in and around Kings Hill Development because of the proximity of the proposed Development.

Evidence also reports on the walkable distance from KH to Manor Park, which is an SAC, being a positive benefit. Wildlife includes a Lake, wildflower meadows, woodland mosaic. There is also a car park and café. It should be noted that space in Manor Park has already been withdrawn from public access to provide for space for relocating slow worms from a nearby development. It is inappropriate

to continually remove land from public access in this way. Note that Slow Worms have been identified on Broadwater Farm and any development would need to take their habitat into account.

KHPC feels this is an unsustainable plan owing to failure to protect the environment.

The proposed development will be a huge eyesore on the local landscape, contributes excessively to the inappropriate urbanization of the area, result in massive increases in vehicular travel inconsistent with climate change initiatives, and will result in excessive strain on local facilities, such as retail, doctor's surgery, dentists, parking, food, and drink and should not be allowed to go ahead. Even Liberty expressed concerns about the impact of the King Hill development on the resources of Kings Hill, and that is for only 120 dwellings!

The proposal makes numerous claims about how it will result in improvements in the area but fails to provide concrete details as to how these will be met. This development represents significantly increased urbanization and would potentially be instrumental in the loss of identity of Kings Hill, West Malling, East Malling, Well Street, Mill Street and Leybourne, and result in the whole area becoming a suburb of Maidstone.

The Kings Hill development was originally intended as a small development with large amounts of green space within the confines of the West Malling Aerodrome brownfield site. This site is bounded by several woods, which were sold off separately by the Ministry of Defence / Kent County Council. Planning obligations were included to ensure that, where the boundary was not continuous with appropriate shielding trees, the developer was required to plant appropriate trees to provide shielding and maintain the visual amenity of the area. Although this has not been fully policed as the development was extended from its original scope to include additional housing and business premises, the surrounding trees do, indeed, largely provide coverage of the worst excesses of the development.

However, the proposed Broadwater Farm development is on the side of the hill, with far-reaching visibility to/from areas such as Bluebell Hill Park and Trosley Park and has no significant shielding to maintain the visual amenity of the area. Indeed, the Design and Access Statement indicates that a number of trees which are currently subject to a TPO (TM/09/00003/TPO) are clearly scheduled for removal to provide access to the parcel of land that was once part of the protected surrounding buffer zone around Kings and apparently added onto the Broadwater Farm title, and to provide the secondary access road connecting to the A228 Ashton Way. As well as resulting in degradation of the visual amenity of Kings Hill, removal of these trees will make the new development in that area very obvious to views from across the Medway valley and from the North Downs Way. In addition, the view from local public footpaths MR114 and MR144 will be lost, which is a significant impact on visual amenity.

Indeed, the illustrative aerial views on Page 68 of the Berkley Design & Access statement provides a representative view of the impact on the visual amenity from such locations. However, the appearance is that all buildings are two stories high; what this illustration does not demonstrate is that the proposals allow for up to 25% of houses to be up to 5 stories tall, which would result in a completely different outlook, and is completely out of character with the area, and will have a horrendous impact on the visual amenity of the area.

The Tonbridge and Malling Local Plan adopted December 1998 classifies the Broadwater Farm area as an "Area of Local Landscape Importance (Policy P3/7)". Although this has not been maintained in the Tonbridge and Malling Borough Council Local Development Framework Core Strategy, that document classifies the area as "Best and Most Versatile Agricultural Land (Policy CP8); a designation that appears to cover less than 20% of Tonbridge and Malling Borough.

A recent report shows that the UK is one of the world's most nature-depleted countries - in the bottom 10% globally and last among the G7 group of nations. It has an average of about 50% of its biodiversity left, far below the global average of 75%. A figure of 90% is considered the "safe limit" to prevent the world from tipping into an "ecological meltdown", according to researchers.

Professor Andy Purvis, research leader at the Natural History Museum in London, said about biodiversity: "It's the foundation of our society. We've seen recently how disruptive it can be when supply chains break down - nature is at the base of our supply chains."

The Berkley documentation describes the fields that have been assigned for development as a monoculture of apple trees. This is far from correct, as other species are scattered through the orchard, such as various types of trees that make up the wind breaks, and scattered inclusions such as alder, birch, willow, ash, and oak. In addition, the long-established hedgerows provide for a diverse flora and fauna and should not be damaged. The fields currently reflect a good position with respect to biodiversity, and it is difficult to see how the development will avoid resulting in significant losses! The Berkley documentation also acknowledges that there are: Great crested newts, Reptiles (three species), Bats (seven species) and Badger on the site; destruction of their habitat, even if temporary, will result in the loss of the species in the area.

The Local Plan adopted 2007 shows this area to be a secondary route between green corridors. This development would significantly impact on the effectiveness of such connectivity for wildlife. Indeed, the retained (including ancient) woodland North of Kings Hill would be virtually surrounded by developments, which would result in a steady decline in the environmental health and diversity of that woodland.

The EIC is recommending focussing on brownfield sites, with levies to discourage use of greenfield sites. Since Brexit, and with increased global warming, food security is a serious issue, and the use of developed farmland for housing (many of the apple trees currently on the site have been growing for 20 years to get to their current level of productivity; to replace them if they were removed would be very far from instantaneous!) The loss of best and most versatile agricultural land cannot be justified. Parliament has also reflected those recommendations in recent speeches; development on prime greenspace is inappropriate in the current climate.

There is currently a great deal of biodiversity within the area, never mind that seen in the fields where the apple trees have been grubbed up, in the wind breaks, inclusions amongst the apple trees, a range of different trees and a wide range of flora making up the wind breaks and wildflowers amongst apple trees and the paths between the apple trees, and in the uncultivated areas. The existing hedgerows should also be protected given their age and support for wildlife.

And even the odd deer can be seen.

Unfortunately, there are some issues with drainage, for example, Pikey Lane is liable to flooding

Conservation Areas

The impact on the New Barn conservation area and the listed buildings in the development and the two access roads is not justified. The development area is significantly larger than that proposed in the withdrawn local plan and now encompasses the conservation area rather than being significantly separate from it. The justification is unclear and appears to result in the loss of significant area that is intended to be part of the proposed extended metropolitan green belt.

Protected Species

The Berkley submission acknowledges protected species in the area but provides no plan for ensuring their future viability. Species include Great Crested Newt, and Slow Worm (see right).

Sustainable Farming

The Broadwater Farm is on the narrow Greensand belt, which is recognized as important for apple growing in Kent, which is one of the headline crops for the county. Taking the highly productive area out of farming will result in the rest of the area being not sustainable as a fruit farm, meaning the total loss of that area of the greensand belt.

Extended Metropolitan Green Belt

The now withdrawn local plan included classifying the land North of Pikey Lane as Green Belt. Kings Hill Parish Council strongly supports the proposed extension to the metropolitan green belt, to ensure that there is a green lung for the excessively high density of housing in the area, and to ensure that the villages of Kings Hill, West Malling, East Malling and Leybourne do not coalesce.

59743 Lucks Hill

Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.

59824 Clare Lane, Mill Street

Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.

Wateringbury

59624 Pizien Well South of A26

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59654 Red Hill near traffic lights

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

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59700 Tonbridge Road near traffic lights

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59722 Pizien Well, A26

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59723 Pizien Well

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59728 Off Red Hill

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59729 Off Red Hill

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59797 West part of Kings Hill Golf Course

SA Objective 1: To improve human health and well-being

Minor positive (+)

The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).

SA Objective 2: To improve equality and access to community facilities and services

Significant negative (--)

The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.

SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

Negative (-)

The site is within 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.

SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

Negative (-)

The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.

SA Objective 5: To protect and enhance biodiversity and geodiversity

Significant negative (--)

The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.

SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality

Significant negative (--)

The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.

SA Objective 7: To protect and enhance the cultural heritage resource

Significant negative (--)

The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.

SA Objective 8: To protect and enhance the quality of water features and resources

Significant negative (--)

The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.

The site contains a water body or water course or falls within or partially within Source Protection Zone 1.

SA Objective 9: To conserve and enhance soil resources and guard against land contamination

Significant negative (--)

The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.

SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

Significant negative (--)

The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.

SA Objective 11: To improve adaptation to climate change so as to minimise its impact

Significant negative (--)

The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland

SA Objective 12: To protect and improve air quality

Significant negative (--)

The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.

SA Objective 13: To protect material assets and minimise waste

Uncertain Negative (-?)

The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Significant positive (++)

The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.

59799 Pizien Well

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59800 East part of Kings Hill Golf Course

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59802 Vineyard South of Hollandbury Park

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59803 East of Red Hill to A26

It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further

59845 South of A26 to East of Wateringbury traffic lights

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West Malling and Leybourne

59432 Oxley Shaw Lane, Leybourne

Small site, no comment

59441 Castle Way, Leybourne

Kings Hill are concerned that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.

59442 Castle Way, Leybourne

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59443 Lillieburn, off Castle Way, Leybourne

Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.

59445 Oxley Shaw Lane, Leybourne

Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.

59447 Ryarsh Lane Car Park, central West Malling

West Malling is an important service centre for the residents of Kings Hill, containing infrastructure which is not present in Kings Hill, such as post office, variety of pubs and restaurants, library; further restricting access to parking would result in issues with availability of such infrastructure, making Kings Hill unsustainable, given the distances required to travel to other service centres.

59456 Baywell, Leybourne

Kings Hill are concerned that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.

59488 Tesco Car Park, central West Malling

West Malling is an important service centre for the residents of Kings Hill, containing infrastructure which is not present in Kings Hill, such as post office, variety of pubs and restaurants, library; further restricting access to parking would result in issues with availability of such infrastructure, making Kings Hill unsustainable, given the distances required to travel to other service centres.

59594 Malling Meadows, St Leonards Street

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

59602 West of King Hill

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59619 Norman Road to the railway

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59622 Norman Road

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59645 Offham Road

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

59658 Behind Parkfoot Garage A20

The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area, such as Town Hill to West Malling and the Birling Road, and the presence of Parkfoot garage nearby. The impact of such development could impact on the safety and throughput of the A20.

59672 Behind Parkfoot Garage A20

The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area, such as Town Hill to West Malling and the Birling Road, and the presence of Parkfoot garage nearby. The impact of such development could impact on the safety and throughput of the A20.

59699 Offham Road to Farterwell Road

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

59714 Offham Road next to Church Fields

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

59716 Offham Road to St Leonards Street

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59733 Junction of King Hill and Ashton Way

Access to this Site would be via King Hill, at a junction close to a very busy roundabout. KHPC consider that this would impact on road throughput and safety, especially with cars coming off the roundabout at speed, having to stop for cars waiting to turn right into the proposed site.

59756 More of Forty Acre Field next to Ashton Way and A20

The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area, The impact of such development could impact on the safety and throughput of the A20.

59762 Hawley Drive North of A20

No comment

59807 Station Approach South of West Malling station

There have already been a number of accidents, including fatal, at the junction of Station Approach and A228. Adding further traffic onto this junction would be of great concern in terms of road safety. The Site has been rejected on appeal, primarily given the environment in the area, and KHPC see no justification for including this site in the proposed local plan.

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

Previously turned down by TMBC, Appeal rejected.

59814 West of Ashton Way

It is unclear as to how access could be provided to this location; direct access to the A228 would be a safety issue. There have already been a number of accidents, including fatal, at the junction of Station Approach and A228. Adding further traffic onto this junction would be of great concern in terms of road safety. The Site has been rejected on appeal, primarily given the environment in the area, and KHPC see no justification for including this site in the proposed local plan.

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

59833 Off Park Road off Castle Way

Small site, no comment

59844 More of Forty Acre Field next to Ashton Way and A20

The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area, The impact of such development could impact on the safety and throughput of the A20.

59854 North West of West Malling Station

This location has previously been earmarked for additional parking for West Malling station. Loss of this potential resource could become an impact on the viability of the area to support commuting into London now that Covid 19 impacts are reducing. In the past, many commuters have been forced to drive to other stations including Snodland, Ebbsfleet, Eltham, Mottingham and North Greenwich, to pick up better services thus adding to congestion on our already busy roads and increasing air pollution.

59860 Off Swan Street by Lavenders Lane

There have already been several accidents, including fatal, at the junction of Station Approach and A228. Adding further traffic onto this junction would be of great concern in terms of road safety. The Site has been rejected on appeal, primarily given the environment in the area, and KHPC see no justification for including this site in the proposed local plan.

West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.

59863 South of M20 next to Junction 4

It is assumed that access would be via Bull Road. Bull Road is a narrow road, with limited visibility. Adding an employment area at this point would have a disproportionate impact on the traffic in the area, including to/from Kings Hill and Leybourne Chase, leading to reduced throughput availability and reduced road safety.

Appendix 3: Traffic Report January 2019

[extract]

MEREWORTH PARISH COUNCIL

HIGHWAYS TECHNICAL APPRAISAL OF PROPOSALS WITHIN TONBRIDGE AND MALL-ING BOROUGH COUNCIL LOCAL PLAN 2011-2031 REGULATION 19 PUBLICATION VERSION

Les Henry Associates Limited

1.0 Introduction

1.1 Les Henry Associates Limited have been instructed by Mereworth Parish Council to provide this Technical Appraisal of impact of the proposals for residential development promoted within Tonbridge and Malling Borough Council's Local Plan (2011-2031).

1.2 My name is ***** I am an Incorporated Engineer, a Fellow of the Institute of Highway Engineers and a Member of the Chartered Institution of Highways and Transportation.

1.3 I have been involved in highway and traffic engineering issues for over 35 years in connection with new development and road safety schemes within both the private and public sector.

1.4 I have assisted numerous Parish Councils in Kent with regard to many development proposals and highway improvement schemes since 2007 when I represented and supported Wrotham Parish Council's objections at the Public Inquiry in respect of the construction of a new concrete block manufacturing plant at the existing Celcon plant in Borough Green (Ref: TM/03/2563) which included the provision of the Borough Green bypass.

1.5 I have also more recently assisted Borough Green and Hildenborough Parish Councils and private individuals and companies in Kent with highway safety and development related proposals.

1.6 This Technical Appraisal identifies several problems associated with development proposals within the proposed Tonbridge and Malling Local Plan, and the supporting documents provided in the evidence base.

1.7 This appraisal makes comments in respect of problems with highway capacity, safety and air quality and is in support with the objections raised by Mereworth Parish Council.

2.0 Background

2.1 Tonbridge and Malling Borough Council are currently within the process of producing a new Local Plan. The draft development strategy has identified the possible delivery of a large amount of residential and business development through the plan period which extends between 2019 and 2031.

2.2 Mereworth Parish Council is particularly concerned with the proposals for Strategic Site - Broadwater Farm, North of Kings Hill (SLAA Ref: 358) and Strategic Site — North of Borough Green and Platt (SLAA Ref: 408).

2.3 The Local Plan promotes residential development comprising 900 dwellings on the Broadwater Farm, North of Kings Hill site and 3,000 dwellings on the site North of Borough Green and Platt.

2.4 The prospective applicant for the Broadwater Farm site will be required to prepare a masterplan, to the satisfaction of the Council, reflecting the phasing outlined in Appendix E of the proposed Local Plan and address the full requirements of the other policies in the proposed Local Plan and delivering the necessary infrastructure to meet the needs of the development as identified in the Infrastructure Delivery Plan.

2.5 The masterplan, to be informed by a detailed Transport Assessment, needs to make provision for key pieces of infrastructure necessary to support the development including:

- link road to the A228 opposite the station approach and any other appropriate access arrangements identified.

2.6 The site north of Borough Green and Platt would be developed in phases with the majority of Phases IA and 1B, 1,720 dwellings, are expected to be completed by 2031. The residual amount of Phases IA and 1B, 380 dwellings, is anticipated to be delivered in the post-plan period along with Phase IC, 900 dwellings.

2.7 Whilst the site is quite distant to the northwest the traffic generated by the proposals will have a negative impact on B2016 Seven Mile Lane and its junction with A26 in the proximity of Mereworth Primary School.

2.6 In support of the draft Local Plan the Council have commissioned Mott Macdonald to produce a Transport Assessment (TA May 2018) to evaluate potential transport impacts from the proposed Local Plan development.

2.7 Subsequently, an Addendum document was produced in August 2018 to look at a selection of junctions in more detail and to identify possible mitigation works.

2.8 The TA purportedly makes best use of existing data including Transport Assessments supporting recent developments in the borough, transport evidence associated with strategic sites in the draft development strategy and relevant data from the 2011 Census.

2.9 This Technical Appraisal focuses on the following 4 junctions that were included in analyses within the TA and Addendum -

1. Ashton way A228 (SB), Tower View, A228 (5);
2. Mailing Road (N&S), Gibson Drive (6);
3. Tonbridge Road A26 (E&W), Mailing Road (7); and
4. Tonbridge Road A26, Seven Mile Lane N B2016 (N), Seven Mile Lane A228 (S), A26 bound for Hadlow (8).

(The numbers in brackets are the junction numbers as quoted in the Mott Macdonald TA dated May 2018 and subsequent Addendum dated August 2018.)

2.10 This appraisal pays particular attention to A228 Mailing Road in the vicinity of its junction with Kent Street and B2016 Seven Mile Lane close to its junction with Mereworth Road/The Street in the proximity of Mereworth Primary School where the TA has not undertaken any assessment.

2.11 Tonbridge and Malling Borough Council and Kent County Council (the highway authority) reviewed the list of housing and employment sites in the emerging Local Plan to assess the availability of transport information. If traffic data gaps were found in the existing Transport Assessments, it was agreed that traffic surveys would need to be undertaken by the end of November, as December, January and February are non-neutral months.

2.12 I have looked at the following 3 scenarios for both the AM and PM highway network peak hours: -

1. 2017 Baseline.
2. 2031 Traffic growth but without development (Do Minimal); and
3. 2031 Traffic Growth with development (Do Something);

3.0 Comments Regarding the Transport Assessment and Addendum

3.1 The Transport Assessment (TA) refers to the 4 junctions above as being in the Broadwater Farm (North of Kings Hill) section of the report and lies within Distribution 2 for the traffic Growth Rates for 2017 to 2031.

3.2 The TA includes very low traffic growth predicts from TEMPRO of between 3% and 2.9% for the AM and PM highway network peak periods respectively between 2017 and 2031 at Table 5.

3.3 The TA states "Alternative assumptions" were applied to the growth factors.

To avoid double counting Local Plan traffic growth from the Tonbridge and Malling area, the number of jobs and households in TEMPRO were adjusted, thereby only taking into consideration the growth from neighbouring districts and manually adding the Tonbridge and Malling trips, which were taken from the draft Local Plan Development Strategy"

3.4 I disagree and consider the use of alternative assumptions as being wrong. The TEMPRO program uses data submitted by Local Authorities across the UK in the form of AMR (Annual Monitoring Report / Authority Monitory Report). Due to changes in statutory reporting requirements, these are not available for all areas. Other sources listed are LDP (Local Development Plan), SHLAA (Strategic Housing Land Availability Assessment), LHS (Local Housing Strategy), UDP (Unitary Development Plan), CS (Core Strategy) and HLS (Housing Land Supply). In some cases, multiple sources, supplementary documents, updates, or appendices have been used to inform the trajectory.

3.5 In this case, the data used for Tonbridge and Malling Borough Council is the 2014 AMR which had a horizon to 2021, which is beyond the scope of the TA. (Appendix A).

3.6 Nonetheless the TA does not stipulate what "alternative assumptions" have been used and therefore I cast further doubt on the data used for traffic growth.

3.7 I have calculated growth figures of 9% for the AM period and 11% for the PM period for the same timeframe and only used cars as the mode of transport.

3.8 The TA states the industry standard TRICS database has been used to calculate the proposed development traffic and the figures are detailed in Tables 9 and 10 at page 19 However. The TA does not stipulate which sites were selected from the TRICS database and therefore the data cannot be validated.

3.9 The TA Addendum also states that a 10% reduction factor has been applied to traffic generation as the proposed developments will include measures and mitigation to support alternative modes to the car will be implemented via developer funding.

3.10 This 10% reduction is based upon research commissioned by the Department for Transport which found a programme of smarter choices incentives (such as encouraging walking, cycling, travelling by public transport and car sharing) over 10 years could cut car traffic significantly, resulting in urban peak traffic potentially being reduced by 21% and off-peak traffic by 13%.

3.10 The document "Smarter Choices - Changing the way we travel" was published on 24th June 2005 and was archived on 4th March 2010.

3.1 1 Chapter 1 of the document concludes with the following statement: -

"We emphasise that our conclusions are therefore about a potential, not a forecast. Whether this potential is considered desirable or not depends on policy judgements. If it is considered desirable, whether it is realised or not depends on the degree of commitment and consistent application of soft factor interventions which is secured in practice. These are issues of political will rather than research or modelling." (My highlighting).

3.12 At the time of writing this evidence I am aware of the financial pressures currently being experienced by Kent County Council and proposals to cut funding to numerous bus services across the County. This is one factor that will not help in promoting a modal shift from use of the private car to public transport.

3.13 Furthermore, the current price for an adult daily bus ticket in the Maidstone Zone is £5.40 and the cost to park at West Mailing railway station car park is £5.00 per day. Although the price is favourable for car drivers, there are limited spaces at the car park (159) but the balance of incentives to use public transport are outweighed by the convenience of the car usage especially at times of inclement weather.

3.14 In addition, the Car Parking standards within the plan are confusing as Appendix G — Residential Parking standards conflicts with the residential car parking standards within Appendix H.

3.15 Appendix G appears to be a direct copy of Kent Highway Interim Guidance Note 3 dated 20th November 2008. However, the residential car parking standards detailed in Appendix H are more generous whilst still being expressed as maximum standards.

3.16 I therefore seriously doubt whether a 10% modal shift from the private car could be achieved.

3.17 The TA describes how development traffic has been added to the proposed highway network but there are no pictorial or diagrammatic details to illustrate this procedure and allow validation of the data.

3.18 The following industry standard software packages have been used to assess the operation of the different types of junctions within the stud area:

1. JUNCTIONS 9 (PICADY)- Priority junctions
2. JUNCTIONS 9 (ARCADY) - Roundabout junctions
3. LINSIG — Traffic signal-controlled junctions.

3.19 PICADY is an acronym for "Priority Intersection, Capacity and Delay", ARCADY- "Assessment of Roundabout Capacity and Delay whilst LINSIG is traffic signal modelling software that was originally developed by Brian Simmonite who was a Traffic Signal Engineer at Lincolnshire County Council.

3.20 The TA does not include any output data from the software applications used for the various junction analyses and again there is no way of checking the modelling to validate the results.

4.0 Site, Highway and Transport Characteristics

4.1 The proposed redevelopment area lies to the north of Mereworth and to the east of A228 Malling Road and Ashton Way. The development site to the North of Borough Green and Platt is situated further away to the northwest but will have some impact on B2016 Seven Mile Lane.

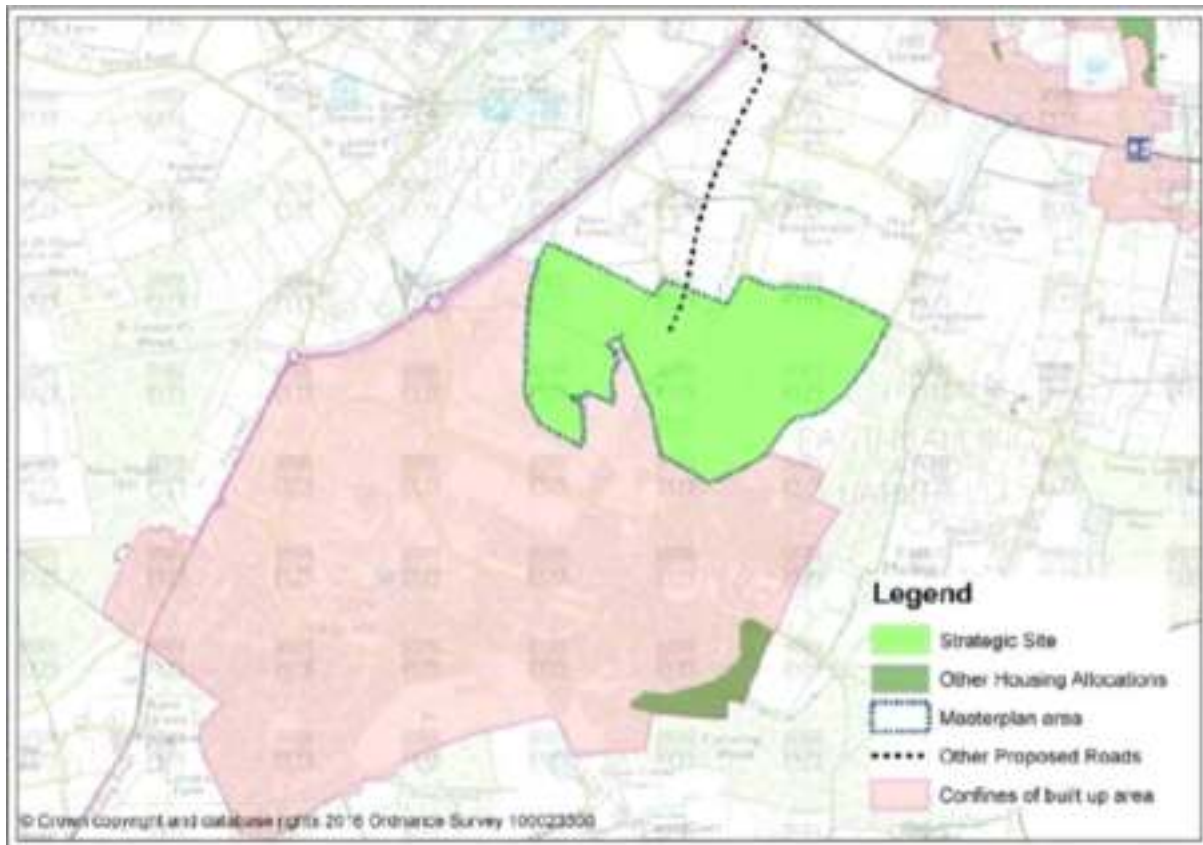


Figure 1: Site Location Plan

4.2 A228 Malling Road in the proximity of the junction of with Kent Street is a narrow two-lane single carriageway with no system of street lighting and a single footway on alternate sides of the carriageway.

4.3 West Malling Railway Station is approximately 2.5miles away to the north and provides regular services to London Victoria, Ashford International and Canterbury West.

4.4 The local bus services can be boarded in the centre of Mereworth Village with services throughout the day to surrounding towns and villages as follows: -

Route 7 Tonbridge Wells, Tonbridge, Hadlow, Mereworth, and Maidstone.

Route 77 Tonbridge, Mereworth, Kings Hill, West Malling Station.

Route 151 Kings Hill, West Malling, Snodland, Halling, Rochester, Chatham.

4.5 There are also several school bus services that are available, and Bus Timetables are provided in Appendix B.



Figure 2: Highway Context Plan

5.0 Planning Policy

National Policy

5.1 A revised National Planning Policy Framework was published by Ministry of Housing, Communities and Local Government in July 2018 and replaces the earlier document published in March 2012.

5.2 The NPPF presumes in favour of sustainable development and is a material consideration in planning decisions. Core land-use planning principles are put forward to underpin both plan making and decision taking, one of which is to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

5.3 Paragraphs 102 to 111 address the relationship between development and sustainable transport as follows: -

Promoting sustainable transport

102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed.
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised — for example in relation to the scale, location or density of development that can be accommodated.
- c) opportunities to promote walking, cycling and public transport use are identified and pursued.
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed, and considered — including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking, and other transport considerations are integral to the design of schemes and contribute to making high quality places.

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be considered in both plan making and decision-making.

104. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education, and other activities.
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);
- e) provide for any large-scale transport facilities that need to be in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into

account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time — considering their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.

105. If setting local parking standards for residential and non-residential development, policies should consider:

- a) the accessibility of the development.
- b) the type, mix and use of development.
- c) the availability of and opportunities for public transport.
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework).

In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe, and secure, alongside measures to promote accessibility for pedestrians and cyclists.

107. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, considering any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

Considering development proposals

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be — or have been — taken up, given the type of development and its location.
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

110. Within this context, applications for development should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second — so far as possible — to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
 - c) create places that are safe, secure and attractive — which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations.
111. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Local Policy

5.4 In response to the publication of the National Planning Policy Framework in March 2012, Tonbridge and Malling Borough Council Members have agreed to the production of a new Local Plan.

5.5 This new Plan, once adopted, will form part of the Council's Development Plan and will replace the current suite of adopted local plans. The new Plan will have a time horizon up to 2031.

5.6 In the interim, the suite of adopted local plans and any adopted Neighbourhood Plans will continue to represent the core of the Council's Development Plan, having been prepared under the Planning and Compulsory Purchase Act 2004.

5.7 Tonbridge and Malling Borough Council carried out a public consultation in respect of the proposed new Local Plan which was entitled "The Way Forward".

5.8 The Consultation ran between 30th September 2016 and 25th November 2016.

5.9 As part of this process TMBC carried out a "Call for Sites" exercise to provide an opportunity for landowners, developers, parish councils and others to promote sites to be assessed for their suitability and deliverability for development as part of the Council's Strategic Land Availability Assessment (SLAA). The exercise took place from the spring 2014 until 1st September 2015.

5.10 Tonbridge and Malling Borough Council's "Managing Development and the Environment Development Plan Document" was adopted by the Council on 20th April 2010 and forms part of the Local Development Framework (LDF) and therefore forms part of the statutory Development Plan. It applies existing and emerging national and regional policies at the local level.

5.1.1 Policy SQ8 is particularly relevant to this case as follows: -

POLICY SQ8

1. Before proposals for development are permitted, they will need to demonstrate that any necessary transport infrastructure, the need for which arises wholly or substantially from the development is in place or is certain to be provided.
2. Development proposals will only be permitted where they would not significantly harm highway safety and where traffic generated by the development can adequately be served by the highway network.
3. Development will not be permitted which involves either the construction of a new access or the increased use of an existing access onto the primary or secondary road network (as defined by the Highway Authority) where a significantly increased risk of crashes or traffic delays would result. No new accesses onto the motorway or trunk road network will be permitted.
4. Development proposals should comply with parking standards which will be set out in a Supplementary Planning Document.
5. Where significant traffic effects on the highway network and/or the environment are identified, the development shall only be allowed with appropriate mitigation measures, and these must be provided before the development is used or occupied.

Proposed Policy LP LP42: Parking Standards

1. As a starting point for decision-taking on acceptable parking provision in developments, the standards set out in Appendix G (residential development) and Appendix H (non-residential development) shall be used as guidance.
2. In addition to the parking standards the Council will take account of local circumstances including the layout of the development, the mix of dwellings, the character of the local area and the proximity of public transport nodes when determining what would represent an acceptable proportionate provision of parking.
3. New dwellings will be required to make provision of a charging point for electric vehicles as an integral part of the design of each individual property. The charging point will need to be secure and conveniently located to the parking area.
4. Non-residential development should, where practicable and proportionate, make provision for the parking and charging of electric vehicles and for cycle parking facilities which should be sited in a convenient, safe, secure and sheltered location.

5.12 There seems to be some confusion within the proposed Local Plan in terms of residential car parking standards as the following two standards are quoted, the first being taken from Kent Highway Services Interim Guidance Note 3 dated 20 November 2008 quoted in Appendix G (Parking Standards — Residential Development) and the standards quoted in Appendix H: (Parking Standards — Non-Residential Development) as shown below.

GUIDANCE TAPLC FOR RCSDCNTIAL PARKING

GUIDANCE TABLE FOR RESIDENTIAL PARKING

LOCATION	CITY/TOWN CENTRE	EDGE OF CENTRE	SUBURBAN	SUBURBAN EDGE/VILLAGE/RURAL
ON-STREET CONTROLS	No street controls, permitting all to all long stay parking	No street controls, evidence where and/or existing situations (Note 1)	No, or very limited, on-street controls	No on-street controls, but possibly a tight street layout
NATURE OF GUIDANCE	MAXIMUM (Note 1)	MAXIMUM	MINIMUM (Note 2)	MINIMUM (Note 4)
1 & 2 BED FLATS	1 space per unit	1 space per unit	1 space per unit	1 space per unit
FORM	Controlled (Note 2)	Not allocated	Not allocated	Not allocated
1 & 2 BED HOUSES	1 space per unit	1 space per unit	1 space per unit	1.5 spaces per unit
FORM	Controlled (Note 2)	Allocation possible	Allocation possible	Allocation of one space per unit possible
3 BED HOUSES	1 space per unit	1 space per unit	1.5 spaces per unit	2 independently accessible spaces per unit
FORM	Controlled (Note 2)	Allocation possible	Allocation of one space per unit possible	Allocation of one or both spaces possible
4+ BED HOUSES	1 space per unit	1.5 spaces per unit	2 independently accessible spaces per unit	2 independently accessible spaces per unit
FORM	Controlled (Note 2)	Allocation of one space per unit possible	Allocation of both spaces possible (Note 3)	Allocation of both spaces possible (Note 3)
ARE GARAGES ACCEPTABLE? (Note 4)	No, but will allow of communal space for washing etc.	No, but set as a significant proportion of overall provision	Additional to amount given above only	Additional to amount given above only
ADDITIONAL VISITOR PARKING (Note 5)	None required	Communal areas, 0.2 per unit maximum	No communal, 0.2 per unit	No communal, 0.2 per unit

NOTES

1. Reduced, or even nil provision is encouraged in support of demand management and the most efficient use of land.
2. Parking/passage courts, preferably with controlled entry.
3. Reduced, or even nil provision acceptable for serviced properties, subject to effective tenancy controls.
4. Open car ports or car barns acceptable at all locations, subject to good design.
5. May be reduced where main provision is not allocated. Not always reserved for flats.
6. Lower provision may be considered if vehicular trip rate constraints are to be applied in connection with a standing and embankment travel plan.
7. Best provided side by side or in another independently accessible form. Tandem parking arrangements are often under-utilised.

Figure 3: Appendix G — KCC Interim Guidance Note 3

Tonbridge & Malling Borough Local Plan	
Land Use Class C3: Dwellings	
Use Class C3 covers dwellings for occupation by single persons or families, shared accommodation where up to 6 persons live together as a single household, self-contained individual accommodation with a resident warden (sheltered accommodation) and static residential caravan sites.	
Maximum Vehicle Parking Standards	
	Car Parking
1 bedroom	1 space per dwelling
2 and 3 bedrooms	2 spaces per dwelling
4 or more bedrooms	3 spaces per dwelling
Sheltered Accommodation	1 space per resident warden + 1 space per 2 units
Notes:	<ol style="list-style-type: none"> 1. For 1-bedroom dwellings the parking will usually be provided as communal spaces. For other dwelling sizes part or all of the parking can be provided on a communal basis. 2. The level of car parking provision includes any garages, provided as an integral part of the dwelling or within its curtilage, and/or driveways provided within the curtilage, subject to the preferred sizes set out in Appendix B.
Minimum Cycle Parking Standards	
Individual residential dwellings ⁽¹⁾	1 space per bedroom
Flats & maisonettes ⁽²⁾	1 space per unit
Sheltered accommodation ⁽³⁾	1 space per 5 units
Notes:	<ol style="list-style-type: none"> 1. Cycle parking provision should normally be provided within the curtilage of the residential dwelling. Where a garage is provided it should be of a suitable size to accommodate the required cycle parking provision. 2. Parking provision should be provided as a secure communal facility where a suitable alternative is not available.

Figure 4: Extract of Appendix H — TMBC Local Plan

6.0 Traffic Generation

6.1 An analysis of the industry standard TRICS database identified very few suitably comparable sites for mixed private and affordable housing to identify the traffic that could be generated by the development proposals.

6.2 The TA produced by Mott McDonald does not state what sites from the TRICS database were used to calculate the proposed development traffic, but I have selected a single large development within Kent to provide a reasonable assessment of the likely level of vehicular traffic that could be generated.

6.3 The trip rates and total vehicle numbers for each phase of the development are summarised in the Tables 1 and 2 below and the full TRICS data is provided in Appendix C.

AM 0800-0900hrs			PM 1700-1800hrs		
Arrivals	Departures	Total	Arrivals	Departures	Total
0.118	0.437	0.555	0.328	0.101	0.429

Table 1 : Residential Trip Rates

AM 0800-0900hrs			PM 1700-1800hrs		
Arrivals	Departures	Total	Arrivals	Departures	Total
106	393	500	295	91	386

Table 2: Generated Traffic

6.5 It can therefore be quite clearly seen that the residential development will generate a considerable amount of additional vehicular traffic.

6.6 Mereworth Parish Council are therefore very concerned that the additional traffic generated by the proposed residential development would have significant impacts on the existing highway network in terms of additional congestion and air quality.

6.7 It should be noted that at times considerable levels of congestion is already experienced in the area.

6.8 The existing peak hour traffic baseline figures have been directly extracted from the TA.

6.9 The predicted trips were assigned to the highway network in proportion to the existing peak hour traffic flows. However, it should be noted that as the proposed development is required to provide a direct link to West Malling railway station which abuts the A228 and is a dual carriageway. It is difficult to see what form this junction would take.

7.0 Traffic Flows

7.1 The baseline traffic data has been extracted from the TA and the industry standard TEMPRO has been utilised to update the surveyed traffic figures for the period 2017 to 2031.

7.2 The generated growth rates for 2017 to 2031 were calculated as 9% AM and 11% PM

7.3 A series of traffic flow diagrams for the 4 junctions analysed are provided at Appendix D that detail the predicted flows. The traffic flows presented are different to those in the TA as I have applied different growth factors and trip generation rates as explained above.

7.4 Total traffic flows on links are also provided in Appendix D but it is interesting to note that traffic flows on the A228 Mailing Road in the vicinity of its junction with Kent Street would rise by 17% and 23% in the AM and PM highway network peak hours respectively.

7.5 Similarly the traffic flows on B2016 in the vicinity of Mereworth Primary School would increase by 19% and 14% for the AM and PM highway network peak periods respectively.

8.0 JUNCTION ANALYSES

8.1 As stated above the TA includes results of junction analyses using the industry standard "ARCADY" software. The name of the software is an acronym for Assessment of Roundabout CAPacity and Delay.

8.2 The junction of A228 Ashton Way and Tower View is partially signal controlled and therefore LINSIG software has been used to model the junction.

8.3 The results for the ARCADY analyses are expressed as RFC which is an abbreviation for "Ratio of Flow to Capacity" and generally arms are deemed to operate at theoretical capacity when the RFC reaches 0.850 or 85%, above this figure junctions operate inefficiently, and vehicle queues will develop quickly and increase delays exponentially.

8.4 Traffic signal results are expressed as Degree of Saturation (DOS) Practical Capacity and Practical Reserve Capacity (PRC), where practical capacity is the level of capacity above which the junction is assumed to work inefficiently and is usually taken as 90% saturated. Practical reserve capacity is the amount by which traffic demand can grow before practical capacity is reached.

8.5 The predicted queue of traffic is also quoted in the tables below and this is expressed in vehicles. The length of the vehicle for the purposes of the analyses is 5.75m and therefore a queue of 10 vehicles would measure

57.5m back from the roundabout give way line.

8.6 Analyses for both the assumed AM and PM highway network peak periods of 0800-0900hrs and 1700-1800hrs have been carried out for each of the following 3 scenarios: -

1. 2017 predicted traffic flows.

2. 2031 predicted traffic flows without development; and

3. 2031 predicted traffic flows with development.

10.7 The results of the analyses for the assessed junctions are summarised in Tables 3 to 14 below.

10.8 The partially signalised junction of A228 Ashton Way with Tower View would appear to be operating within capacity in all three scenarios but with delays and additional queuing developing as more traffic is added to the network.

Arm	AM Peak		PM Peak	
	Dos	Max Queue	Dos	Max Queue
A228 East	71.9%	9	49.8%	4
Tower View	39.5%	1	80.9%	6
A228 West	51.4%	1	79.3%	4

Table 3: A228/Tower View Scenario 1

Arm	AM Peak		PM Peak	
	Dos	Max Queue	Dos	Max Queue
A228 East	72.8%	10	50.4%	4

Tower View	40.2%	1	80.5%	6
A228 West	52.2%		82.7%	4

Table 4: A2281Tower View Scenario 2

Arm	AM Peak		PM Peak	
	Dos	Max Queue	Dos	Max Queue
A228 East	75.4%	10	51.8%	4
Tower View	41.9%	1	84.0%	7
A228 West	54.6%	1	87.5%	7

Table 5: A228/Tower View Scenario 3

10.9 The analyses of the roundabout junction of the A228 Malling Road with Gibson Drive show the A228 northern arm to be operating beyond its theoretical capacity in both peak periods and all 3 scenarios.

10.10 It is also curious to note that although the RFC for the northern arm in the am peak reduces from scenario 1 to 2 and further at scenario 3 but the vehicle queues lengthen.

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	1.021	66.0	0.965	32.0
Gibson Drive	0.630	6.0	0.806	4.0
A228 South	0.868	8.0	0.750	3.0

Table 6: A228/Gibson Drive Scenario 1

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	1.002	87.0	0.998	48.0
Gibson Drive	0.641	2.0	0.837	5.0
A228 South	0.895	8.0	0.776	4.0

Table 7: A228/Gibson Drive Scenario 2

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	1.011	189.0	1.011	157.0
Gibson Drive	0.641	2.0	0.843	6.0
A228 South	0.949	18.0	0.828	6.0

Table 8: A228/Gibson Drive Scenario 3

10.11 The roundabout junction at A228 Malling Road and A26 Tonbridge Road is shown to operate within capacity in scenario 1 but the A26 South arm is at its theoretical capacity in the pm peak for scenario 2 and in scenario 3 the junction approaches saturation.

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	0.749	4.0	0.765	4.0
A26 East	0.509	2.0	0.374	1.0
A26 South	0.779	5.0	0.827	5.0

Table 9: A2281A26 Scenario 1

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	0.723	4.0	0.695	4.0
A26 East	0.535	2.0	0.381	1.0
A26 South	0.801	5.0	0.849	7.0

Table 10: A2281A26 Scenario 2

Arm	AM Peak	PM Peak		
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	0.864	8.0	0.888	10.0
A26 East	0.607	4.0	0.500	2.0
A26 South	0.928	5.0	0.930	14.0

Table 11: A2281A26 Scenario 3

10.12 The roundabout junction of A228 Seven Mile Lane, A26 Tonbridge Road and B2016 Seven Mile Lane would appear to be approaching capacity in scenario I with extensive vehicle queuing predicted on A26 North and A228 South in both the am and pm peak periods.

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A26 North	0.996	122.0	0.985	36.0
A228 South	0.780	37.0	0.852	52.0
A26 South	0.798	5.0	0.857	8.0
B2016	0.892	16.0	0.654	3.0

Table 12: A228/A26/B2016 Scenario 1

10.13 All arms are predicted to develop extensive vehicle queues during scenario 3 for both the am and pm peak periods.

Arm	AM Peak	PM Peak		
	Max RFC	Max Queue	Max RFC	Max Queue
A26 North	0.996	149.0	0.989	52.0
A228 South	0.793	50.0	0.858	68.0
A26 South	0.839	7.0	0.889	9.0
B2016	0.914	24.0	0.679	4.0

Table 13: A228/A26/B2016 Scenario 2

Arm	AM Peak	PM Peak		
	Max RFC	Max Queue	Max RFC	Max Queue
A26 North	1.000	274.0	0.996	164.0
A228 South	0.829	109.0	0.868	121.0
A26 South	0.959	25.0	0.985	32.0
B2016	0.962	71.0	0.803	8.0

Table 14: A228/A261B2016 Scenario 3

11.0 Assessment

11.1 The ARCADY analyses show the proposed large-scale residential development to the north of Kings Hill and to the north of Borough Green and Platt villages would lead to large amounts of congestion on the A228 corridor in the vicinity of Mereworth Village and the junction with Kent Street.

11.2 The TA Addendum states the original development trip generation underestimated the traffic impact on the 4 junctions and therefore a manual distribution has been conducted to adjust the level of development flows going through the junctions. In addition, a 10% reduction has been applied to the flows.

11.3 The addendum suggests mitigation will be required at the following junctions queues but does not identify what form this will take: -

1. Ashton way A228 (SB), Tower View, A228 (5);
2. Malling Road (N&S), Gibson Drive (6); and
3. Tonbridge Road A26, Seven Mile Lane N B2016 (N), Seven Mile Lane A228 (S), A26 bound for Hadlow (8).

11.4 However, it is stated that no mitigation will be necessary at the following junction despite the capacity detailed in the adjusted ARCADY analyses: 1. Tonbridge Road A26 (E&W), Malling Road (7).

Arm	AM Peak		PM Peak	
	Max RFC	Max Queue	Max RFC	Max Queue
A228 North	0.902	13.0	0.890	10.0
A26 East	0.646	5.0	0.495	2.0
A26 South	0.927	14.0	0.961	25.0

Table 15: A228/A26 Adjusted Addendum Scenario 3

11.6 It is usually considered the capacity at junctions determines the capacity of the links between junctions.

11.7 However, the A228 in the vicinity of its junction with Kent Street has a carriageway width of between approximately 5.2m and 6.4m as shown in Figure 5 below.

11.8 In accordance with Design Manual for Roads and Bridges: Volume 5 and TA 79/99 the capacity of an "Urban All-Purpose Road" (UAP2 or UAP3) with a 6.1m wide 2 lane single carriageway would have a capacity of 900/1020 vehicles per hour in each direction assuming HGV traffic is less than 15%.

11.9 The existing traffic flows on A228 in the vicinity of Kent Street are 1330 northbound and 1168 southbound for the 2017 AM peak and 1218 northbound and 1248 southbound 2017 PM peak. The road is therefore already carrying more traffic than it was ever designed to carry.



Figure 5: A228 Carriageway Widths

11.10 The traffic flows are predicted to increase to 1450 northbound and 1390 southbound for 2031 AM peak and 1352 northbound and 1385 southbound for the 2031 PM peak.

11.11 The 2031 with development flows are predicted to increase further to 1469 northbound and 1457 southbound and 1548 northbound and 1471 southbound for the AM and PM peaks, respectively.

11.12 The TA fails to identify the fact that A228 Malling Road is operating over its capacity and therefore relies on improvements to the junctions along its length to mitigate the additional development traffic and background growth

11.13 The Infrastructure Delivery Plan includes the following highway improvements associated with the proposed development: -

- a. A228/ site access — new junction required also link to Tower View;
- b. A228/Gibson Drive Improvement;
- c. A228/B2016/A26 — improvements required to the roundabout or traffic signals; and
- d. M20 Jn4 Contribution required towards improvement scheme to allow additional capacity for M20 west off slip.

11.14 However, there are no identification of the need for road widening for A228 Malling Road to provide additional capacity.

11.15 The "CrashMap" website has been interrogated to establish the vehicle collision record for A228 and B2016. In the period between 2015 and 2017 there were 12 vehicle collisions reported on A228 Malling Road between its junctions with Gibson Drive and A26 Tonbridge Road which resulted in 12 slight injuries and 1 fatality. (Appendix E)

11.16 The existing heavy use of the A228 by traffic beyond its capacity is therefore having a negative impact on highway safety.

11.17 Similarly, there are concerns for highway safety on B2016 Seven Mile Lane in the proximity of Mereworth Primary School as additional traffic will be forced to use this route which will conflict with school children being dropped at and collected from school.

11.18 Two vehicle collisions occurred within the vicinity of Mereworth Primary School in the same timeframe which resulted in 5 slight injuries.

12.0 Conclusions

12.1 The additional vehicular traffic generated by the proposals for residential development at the Broadwater Farm site and the site to the north of Borough Green and Platt identified in the proposed Local Plan will have a significant impact on the local highway network in the vicinity of Mereworth Parish.

12.2 Kent County Council as the Highway Authority have raised the following concerns regarding the regarding the width and alignment of the A228 Kent Street as well as local highway safety concerns about the Kent Street crossroads junction:- .

"The A228 is already a serious bottleneck at this point, being exceptionally narrow for an A road."

12.3 The increased traffic forced onto adjoining routes such as B2016 Seven Mile Lane will also become dangerously overloaded with traffic and will give rise to conditions prejudicial to highway safety in the vicinity of Mereworth Primary School at dropping off and collection times.

12.4 The transport issues associated with the proposals have not been correctly considered and therefore the impacts of the proposed development have not been addressed.

12.5 The environmental impacts of traffic and transport infrastructure have not been identified, assessed and taken into account.

12.6 The significant impact from the proposed development in terms of capacity and congestion and highway safety cannot be cost effectively mitigated to an acceptable degree.

12.7 The proposals have therefore been prepared by a strategy that fails to meet the infrastructure requirements and cannot therefore satisfy the NPPF requirement for soundness.

APPENDIX A

TEMPRO DATA

Congestion at the Tower View/ Ashton Way Roundabout

12th September 2018



18th October 2018



19th December 2018



6th March 2019

