



# Aylesford PARISH COUNCIL

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November 2018

## **RESPONSE TO TONBRIDGE AND MALLING BOROUGH COUNCIL LOCAL PLAN REGULATION 19 CONSULTATION**

Aylesford Parish Council has considered the Tonbridge and Malling Borough Council Local Plan and is of the view that Tonbridge and Malling Borough Council have met their legal requirements and their duty to cooperate required under the Planning and Compulsory Purchase Act 2004. However in applying the tests of soundness as defined in Paragraph 182 of the National Planning Policy Framework (NPPF) the Council believes the Plan is not sound in respect of a number of matters particularly in respect of the allocation of two of the five strategic sites. The Council will set out its comments below in respect of why it believes the allocation of these two sites are not justified as well as commenting on the soundness of the proposal relating to the allocation of employment land at Aylesford Newsprint without the inclusion of a very necessary qualification in respect of access to this site.

Aylesford Parish is in the north east of Tonbridge and Malling Borough with boundaries to the Medway and Maidstone Councils. Aylesford Parish is one of the larger parishes in the Tonbridge and Malling area with approximately just under 9% of the population and 7.5% of the area of the Borough Council. With its size the Council was surprised to find that two of the five Housing strategic sites and over 30% of the total housing provision in the Local Plan was in the Parish even though the Parish was only 7.5% of the total area. Additionally within the plan the only two identified Areas of Opportunity for further housing within the plan was the further extension of Bushey Wood with 614 units and the East Malling Research Station site which is in Aylesford and Ditton. This does seem a very significant increase in development in a very small part of the Borough whilst other areas further to the west such as Tonbridge with only one strategic site of 480 dwellings fares much better.

The Council will now set out below its specific comments on the Local Plan and in particular its comments on the strategic housing sites at Bushy Wood and South Aylesford.

### LP27: Strategic Site – Bushey Wood, Eccles

The Council is aware that Bushey Wood was identified as an Area of Opportunity containing land with potential for meeting residential needs in the post 2021 period in the Core Strategy (September 2007). It therefore accepts that there is an expectation of some development for this area. However the Plan proposes an expansion of the village to more than three times its existing size expanding from the current 725 to 1625 dwellings up to 2031 and to 2239 dwellings beyond 2031. This is a massive increase on a rural settlement in what is still fundamentally a



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rural area. This Council believes that this increase in size cannot be justified particularly as it appears to contradict Policy LP5 within the plan. This policy states that for other rural settlements like Eccles, “development will be restricted to development that is proportionate to the scale and appropriate to the character of the settlement”. It appears to the Parish Council that more than trebling the size of the village of Eccles is not proportionate in its scale or in the changes it will make to the character of this village and therefore it is contrary to Policy LP5 and cannot be justified.

The Council would acknowledge that some development is appropriate but that for it to be appropriate both in its scale and to preserve the character of the existing village, in line with Policy LP5, an acceptable increase would be in the region of an additional 500 dwellings. The Council accepts this reduced development should be completed in the lifespan of this plan thereby no longer requiring the need for further development to be included in an Area of Opportunity.

The Council therefore believes that, without the proposed change of a reduction in dwellings to 500, Policy LP27 of the plan is not sound as what is proposed is not justifiable. The Council would also propose that the reduction in the number of dwellings can be accommodated in part from the 300 dwellings surplus that exists within the Plan and also by transfer of some dwellings to an extension of the number of dwellings being provided at Broadwater Farm north of Kings Hill, as highlighted in the later General Comment on Housing Provision within this document.

In terms of the infrastructure required to support this development, whether it doubles or trebles the size of the village the Council believes, very strongly, that the infrastructure improvements set out in the policy have to be implemented but that the policy also needs to be expanded to include and specifically refer to the following

- Bull Lane needs to be made local traffic only and all Southern Water traffic diverted via the new Bull Lane south and north links
- Access to the new Court Road, Rochester Road and Pilgrims Way should ensure equal access to the A228 and A229 particularly as the A229 not only provides access to both motorways but also will be the main access point for Maidstone as the A229 is a dual carriageway right into the heart of Maidstone. With the increase in the number of dwellings, whether doubled or trebled, access through Aylesford village will not be practicable. Pilgrims Way will therefore be the main access point to the A229 and even with the current levels of traffic this is a dangerous road. This road will definitely require improvement with the significant increase in traffic arising from this development
- The road infrastructure improvements should be completed before the development starts
- That if there is a need to move the Eccles Football Club and the allotments that they are moved to new and improved facilities.



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### LP28: Strategic Site – South Aylesford

This site has been part of an unofficial green belt that exists between Maidstone and the Medway Gap (Aylesford is part of the urban group known as the Medway Gap) and which has been included in the Tonbridge and Malling Borough Council Core Strategy as the Mid Kent Strategic Gap. The function of the Mid Kent Strategic Gap is to act as a physical break maintaining the separation and separate identities of the built up areas of Maidstone, Medway Towns and the Medway Gap.

If this site is developed it will remove this gap between the built up areas of Maidstone and the Medway Gap thereby creating an urban sprawl from the western end of the Medway Gap all the way into and beyond Maidstone. This Council believes the retention of this gap is essential in order to prevent one extremely long urban sprawl with increased traffic congestion, worsening of the already poor access to the hospital on Hermitage Lane and the probable merging of the Aylesford and Maidstone AQMA's creating new poor air quality areas and making it worse in the existing air quality areas.

Therefore the Council is proposing that the South Aylesford site is not developed and that it is protected in the plan as a green lung between Maidstone and the Medway Gap. It is proposed that the green lung continues in line with the intention of the original Mid Kent Strategic Gap and continues across Hermitage Lane and links up with the sites linked to and included in the East Malling Research Station which has been highlighted as an Area of Opportunity. This would require removing this site as an Area of Opportunity from the plan.

The Council believes the inclusion of the South Aylesford site and the East Malling Research Station as an Area of Opportunity in the Plan is not justified for the reasons given above. Their inclusion in the Plan is not sound as there are reasonable alternatives where the dwellings from this site could be located.

The Council believes that the 1000 dwellings from the South Aylesford site would be better located as an expansion of the strategic site at Broadwater Farm, north of Kings Hill. This site has the land capacity to take these additional dwellings whilst still retaining a green lung between Kings Hill and East Malling and the Medway Gap which could be incorporated as part of the proposed expansion of the Green Belt.

This site has many more advantages than the South Aylesford site as it would have access to the many services and facilities of Kings Hill as well as direct access to the A228 dual carriageway feeding into the Kings Hill area, access to which would be improved by the inclusion of the link road to the A228 opposite the Station Approach. Conversely the access from the South Aylesford site is to the already over capacity A20 which would require significant improvements made to this road including new roundabouts at the Coldharbour junction to the motorway as well as the junction of the A20 with Mills Road and Hall Road. Additionally there would also



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have to be significant improvements to the A20 junction with Hermitage Lane and at the other end of Hermitage Lane at the A26/Fountain Lane junction.

It is for the above reasons that this Council believes that development should not take place at South Aylesford and that the proposed 1000 dwellings at this site should be provided at the strategic site at Broadwater Farm north of Kings Hill.

If it is determined to proceed with development at South Aylesford as set out in the Local Plan the Council would still wish to see the removal, from the Plan, of the East Malling Research Station as an Area of Opportunity as no justification for the inclusion of this site has been given and most importantly no analysis of the consequences of development on this site included. However, the allocation of this site as an Area of Opportunity gives an expectation of development and a pre judgement of development before any consideration has been given of the consequences of the development of this site. Therefore it would be more appropriate to remove it from the Plan and to wait for proper consideration to be given to the allocation of this site, including the consequences of the development of this site at the next Local Plan Review covering the period beyond 2031. The Council would also wish to see the following changes made to Policy LP28 as it relates to infrastructure improvements:-

- The link road between Hermitage Lane and the 20/20 roundabout on the A20 must be completed before any development commences.
- That no work can commence on the development before and not until after completion of works to improve the capacity of the Coldharbour roundabout on the A20
- That in addition to making a proportionate contribution to (a) the improvement to the A20/Hall Road/Mills Road junction, (b) local improvements to the Hermitage Lane/A20 junction and (c) improvements at the southern end of Hermitage Lane at and leading to the junction between Fountain Lane and the A26 Tonbridge Road no works can commence on the development until these improvements are completed.

### General Comment on Housing Provision

In view of the comment expressed by the Council about the transfer of the dwellings at the South Aylesford site to the strategic site at Broadwater Farm, north of Kings Hill it would also be feasible to transfer part of the small shortfall from Bushey Wood to this site as well.

### LP35: Employment Land: Former Aylesford Newsprint Site

The Council supports the commitment of Tonbridge and Malling Borough Council through this Policy to restrict this site for employment land use only. However it notes that as part of this policy it is intended to open



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Bellingham Way which the Council does not oppose as long as there is a clear commitment within this Policy that Bellingham Way will not be opened until highway improvement works have been completed at the Station Road/Hall Road junction.

This change in Policy LP35 is necessary because without this improvement the over stretched and already over capacity Station Road/Hall Road junction would not be able to cope causing further congestion back down Hall Road to the A20, along Forstal Road and into Aylesford Village as well as Station Road leading back on to Bellingham Way and the newly designated employment land.