

CPRE KENT

Tonbridge & Malling District



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Ref: Regulation 18 Planning Consultation

Date: 24 November 2016

The Tonbridge and Malling District of CPRE seeks to comment on a Regulation 18 consultation

Question 1: Do you agree or disagree with this set of objectives for the new Local Plan.

The development of a strategic vision for the Borough is an essential feature at this stage of plan preparation. A vision for the future of the area should focus on the critical issues the plan will need to address and establish a direction of travel for the objectives and policies that follow.

At this stage the Local Plan evidence base (as listed in paragraph 3.1.1 of the consultation document) is somewhat limited and will need to be developed further. The following pieces of work are relevant to the borough and will assist the council to identify the issues that face the communities, environments and businesses locally. Some have already been prepared by the council and should be updated if necessary; others are already available from other organisations such as the Environment Agency and KCC. Some, including Landscape Character Assessment are essential and should be commissioned by the Council.

It is important at this stage in the process that the Council recognises the existing evidence base and clearly identifies what else is necessary to support plan-making and decision-making in development management. Important strategies, research and plans relevant to plan-making include the following.

- Landscape Character Assessment
- Ancient woodland Inventory
- Agricultural Land Study
- Water Cycle Study
- Updated Open Space Strategy
- Green and Blue Infrastructure Strategy
- Heritage Strategy
- Integrated Transport Strategy
- Cycling Strategy
- Borough health profile
- Transport modelling
- Air Quality Action Plans
- Surface Water Management Plan
- River Basin Management Plan
- Catchment Flood Management Plan

The issues identified for the borough in the consultation document are somewhat limited, partly as a result of a very incomplete recognition of important elements of the existing evidence base in the draft Local Plan. Gaps in the evidence base need to be identified and filled (where possible) early on in plan preparation.

The absence of a vision and an incomplete evidence base makes it somewhat difficult to comment on the plan objectives, which are as follows:

“Plan Objective 1: As far as possible to provide for homes and jobs that are best suited to meet identified local needs.

Plan Objective 2: Support and sustain local communities across the borough, big and small, by planning to meet identified needs, including needs for community facilities.

Plan Objective 3: Protect high value, important natural and heritage assets.

Plan Objective 4: Deliver sustainable growth to support urban and rural economies, making the best use of infrastructure.”

Although broadly acceptable, these objectives would be relevant anywhere in Kent. CPRE encourages the Council to develop the Vision, Issues and Objectives further, to ensure the objectives are locally focused and proactively establish a direction for development in the borough.

In the meantime CPRE Kent would like to suggest the following amendments to the proposed objectives:

4. **Amend Plan Objective 1 as follows:** *As far as possible to provide an adequate mix of housing types, size, density and tenures ~~to provide for homes and jobs that are best suited to meet identified local needs.~~*
2. **Amend Plan Objective 2 as follows:** *Support and sustain local communities across the borough, big and small, by improving access to quality local employment, sustainable transport, community facilities and services, and communications infrastructure. ~~planning to meet identified needs, including needs for community facilities.~~*
3. **Amend Plan Objective 3 as follows:** *Protect, and enhance high value habitats, populations of species of principal importance and valued landscapes, important natural and heritage assets and seek opportunities to create and enhance habitat networks and promote landscape scale conservation.*
4. **Amend Plan Objective 4 as follows:** *Deliver growth in sustainable locations, growth to support urban and rural economies, making the best use of existing infrastructure and using land efficiently, with an emphasis on the use of brownfield sites and avoiding best and most versatile agricultural land.*

Additional objectives will also be required, such as:

To protect and enhance the character, appearance and setting of the District's towns and villages, giving particular attention to valued landscapes, the Green Belt, and historic and cultural assets.

To deliver high quality development that is designed and located to respond robustly to the challenges of a changing climate, reduce carbon emissions and minimise pollution.

Of course the final suite of objectives will evolve as the evidence base research emerges. Currently they do not seek to demonstrate an understanding of the pressures and opportunities relevant to the Tonbridge and Malling borough.

Question 2: Do you agree with this set of building blocks for the Local Plan Strategy?

CPRE supports the use of brownfield land first for fulfilling housing need.

CPRE agrees that the proposed set of 'building blocks' are a reasonable start for identifying land to meet development requirements. It is essential that land is used efficiently. Therefore land in the urban areas, and other brownfield land, should be subject to thorough assessment to determine its potential contribution to the housing requirement. For example, a detailed

assessment of a site might determine that (with appropriate design) a substantial contribution to the housing requirement might be made despite its location within a conservation area or other area of constraint.

A potential yield of 267 units from brownfield land within settlements is too low and this contribution should be increased substantially. The potential to make underused land or buildings in public ownership available for redevelopment should be carefully researched. Further, a detailed and proactive 'urban capacity' style analysis of under-used sites, sites likely to be made vacant during the period of the plan, sites in regeneration areas, and vacant or derelict buildings should be undertaken. Not all landowners will be aware of the call for sites and the council may need to take steps to seek the intentions of landowners and potentially assist with assembling, de-risking sites and unlocking development sites.

3. Do you agree or disagree with this set of guiding principles?

The guiding principles in general appear well founded. They do not, however, identify a sequence, or an order, with which they should be applied to ensure that development is directed to the most sustainable locations.

Most councils use a settlement hierarchy approach to ensure that development is focused at those settlements where the availability of services, infrastructure and employment is greatest. Local need should be addressed relative to an agreed Settlement Hierarchy (perhaps influenced by Housing Market areas) and which predominantly directs development to the principle urban areas in the first instance, with smaller amounts in the well served settlements according to their capacity and constraints. In this way (unless constrained by designations such as Green Belt, AONB or sensitive heritage assets), well served settlements may be able to assist meeting housing need in the borough.

It would be preferable if the guiding principles were divided into two groups. The first should set out important principles for siting development so that it is directed to the most sustainable locations in the first instance. For example, it could refer to previously developed land in urban areas, followed by focussing opportunities adjacent to the principal urban areas, followed by smaller sites at well served villages to meet local needs. This will almost certainly have a relationship to the settlement hierarchy. Of course, some villages are only suitable for smaller developments because of landscape, Green Belt or heritage designations and these should be specified.

The second group of guiding principles, should be more general, and include parts 3 - 6

"The principles identified to guide decisions about the location of future development are as follows:

- 3. Locating new development in reasonable proximity to transport hubs, utilising and building upon existing infrastructure*
- 4. Locating new development in the least constrained parts of the borough*
- 5. To provide a mixed portfolio and location of sites, big and small, to meet a range of needs throughout the duration of the plan period up to 2031, over the short-term (up to 5 years), medium-term (6-10 years) and over the long-term (11-15 years)*
- 6. To deliver a level of growth at key locations to facilitate significant improvements to support infrastructure, e.g. schools, highways and healthcare, for the benefit of local communities*

Point 7 of the key principles should be deleted. Point 5 makes adequate reference to providing a mixed portfolio of sites. Councils which focus excessively on larger sites can have difficulty demonstrating a 5 year supply at the Local Plan examination. A mixed portfolio of sites,

including small sites, is essential to ensure housing delivery in the early years of the plan. Large sites that might deliver wider plan objectives, such as essential major infrastructure improvements, often only deliver housing in later periods of the plan.

4. Do you agree or disagree that this potential approach to a development strategy could provide a sound direction for the new Local Plan to take?

The plan follows an unusual approach to preparing a development strategy that appears to be somewhat site led. CPRE is concerned that this may have caused some confusion for consultees. As a result, if a speculative proposal were to be received by the Council it would be very difficult to determine whether it would accord with the strategy.

CPRE understands that the strategy could deliver in the region of 10,000 homes. Sites for only 6,000 homes, however, are required and therefore the amount of land finally allocated for development would need to be significantly reduced. Unfortunately, the lack of a properly articulated strategy makes it difficult to identify which sites should be preferred. CPRE has made comments on a number of sites that make up the strategy at the end of this consultation response.

CPRE would like to make the following additional comments:

1. Tonbridge and Malling Borough Council need to carefully consider the impacts of the strategy on the environment and infrastructure in the borough. For example proposals that change the primary road network have far reaching effects that require thorough investigation with regard to the working of key highway nodes like junctions and roundabouts such that the integrity of the working of the primary road network is not impacted.
2. CPRE agrees that land set aside in previous development plans to fulfil future need, particularly where it is damaged, should now be considered for development but subject to an Area Action Plan (or a Development Brief adopted as SPD) that takes account of the various planning constraints.
3. In Section 5.9 'The Way Forward' seeks public views on a list of preferred sites but has not published a Sustainability Appraisal of sites. This makes it difficult for consultees to come to informed judgments about whether they would be sustainable and whether there are alternatives that should be preferred. There is no information as to why many sites have been rejected and others are included over and above the crude distance criterion set out in paragraph 5.8.1.

The Sustainability Appraisal / Strategic Environmental Appraisal of sites should be a key component of choosing sites for a development plan and best practice would suggest that sustainability appraisal of sites should be available at this stage. A consultation on broad options does not suffice if these sites progress to a Regulation 19 Plan, since the Council would find it hard to demonstrate that SA had been an iterative part of plan-making. This is an essential part of the Environmental Report and the particulars it must contain and are specified in the SEA Regulations.

A 'preferred options' consultation should incorporate site sustainability appraisals. In this way the Council will be able to ensure that SA influences the choice of sites that the 'suitable alternatives' element of SEA is satisfied, and the consultation expectations of the public are met. The February 2016 LDS has been available for the public to view during this consultation and the council should assume that the public can reasonably expect the Preferred Option consultation to take place as shown.

Please also treat the above as a comment on the Sustainability Appraisal published for consultation.

4. This consultation is primarily about the process and procedures necessary to identify suitable sites. Half way through the document there is a preferred list of sites and the LPA asserts that there will not be a Preferred Options Consultation in the schedule. This suggests that the LPA has prejudged the outcome of the consultation process.
5. It is noted that the most recent Objectively Assessed Need includes affordability uplift to the demographic projections. The reasons for this uplift are not clear, given the approach taken by other local authorities in Kent, the complexity of housing needs (which have not been reviewed) and the role the private sector in meeting housing needs. This uplift may need to be reviewed. In particular, the reasons for applying a higher growth rate are not clear and the implications of Brexit and the outcomes of the Housing White Paper may have consequences that need to be taken into account.
6. The LPA has not scheduled a Preferred Options Consultation before publication of a final Regulation 19 plan. This lack of informed public involvement that would be contrary to the LDS published at the time of consultation on this plan, could lead the Inspector to consider this approach as unsound. Public consultation is an important part of preparing a plan that delivers sustainable development.
7. Sites have been proposed without reference to a Landscape Character Assessment or associated Landscape Sensitivity Assessment and this limits the public's ability to make informed comments. Landscape Character Assessment (which describes variation in the landscape and shows how it is perceived, experienced and valued), together with an understanding of historic landscape character, and ecological features is essential information. Landscape Sensitivity Assessment of the interactions between the landscape, the way it is perceived and the nature of the development can also assist.

Question 11 Do you agree or disagree that the Local Plan should put land into the Green Belt east of West Malling.

CPRE supports the extension of the green belt in this location. The boundary, redrawn to a clear feature in the landscape will mean the Green Belt is more effective, and the policy easier to apply. West Malling is a historic settlement and the extended Green Belt will help protect this setting on the east of village as well as prevent coalescence of settlements.

Question 12 Invites comments on a Green Belt Review

There have been suggestions from some CPRE Members, the Conservation Areas of New Barns and Wells Street for example. However, we have not had time to comprehensively address this question and will come back to it at a future date.

Question 15 Do you think the Council should assess the viability of exceeding the minimum standards required by the Building Regulations I respect of access and water?

Yes, this is essential, given water scarcity in the South East. Standards should also be set for sustainable construction requirements, including renewable energy, site layout, and multifunctional enhancements associated with SuDS.

Preferred Site Comments

Sites at Hadlow

Hadlow is a smaller settlement that has been identified in the draft strategy as presenting opportunities for development across 4 sites. These sites are both to the north west of the settlement and the south east. All sites are located in the Green Belt and if they were to progress, would result in a substantial expansion of the settlement.

197 Carpenters Lane is identified as a 'building block'. It is an existing allocation.

The other sites include 'Goblands Farm' and 'Court Lane Nursery on Court Lane, and 'North of The Paddock' (to the north west of the settlement) and are all constrained by the capacity of rural lanes. The land North of the Paddock is particularly constrained in this respect and development would clearly not preserve the character of the lanes in this locality. There are similar constraints to the sites south east of the village (although they are closer to the Maidstone Road) where the options for development are also constrained by the need to avoid harm to the Hadlow Conservation Area. Highway safety would certainly be an issue too.

Development at this settlement of the extent proposed would have a detrimental impact on the form and character of the settlement. There would be impacts on the character of rural lanes and it is doubtful that the social and highway infrastructure could accommodate development of this scale.

This is a good example of why identifying a settlement hierarchy can assist. A settlement of this scale and sensitivity should endeavour to meet local needs, but should not seek to accommodate development of this scale. It is inevitable that substantial commuting would be required to access services. It is not a sustainable location.

Given the surplus of sites identified it is recommended that the amount of units directed to this settlement is substantially reduced. If a site is still sought at this settlement, then the choice of site and the size of development must be informed by consultation with the local community, Landscape Character Assessment, the capacity of local services, and transport assessment. Previously developed sites should be preferred where possible.

Site at West Malling

CPRE is pleased to see that this historic settlement is perceived as being constrained in terms of development prospects. One site is allocated to the south of the village on Offham Road. Although this site is of a scale appropriate to meet local housing needs in a settlement of this size, CPRE is concerned that the site assessment does not demonstrate an understanding of the substantial heritage constraints associated with the site, and the setting of the Conservation Area and historic park and garden in particular. The comments of KCC heritage/archaeology, and the local conservation officer should be available on the site assessment. One or more small sites close to the village centre may be preferable, subject to views of the Parish Council.

Site at East Peckham

Although an appropriately scaled settlement at East Peckham would make a valuable contribution to meeting housing need, and the viability of services in the village, CPRE is concerned that the site assessment does not demonstrate an understanding of the heritage constraints associated with the site, and the setting of the Conservation Area in particular. The comments of KCC heritage/archaeology, and the local conservation officer should be available

on the site assessment. Furthermore the flood risk associated with this site is an issue of significant concern, both in terms of the safety of the proposed occupants of the site, but also in terms of off-site impact on homes elsewhere in the settlement. More research is required to ensure the impacts can be mitigated, and that the best site has been identified taking account of the views of the local community.

Sites at Tonbridge

Tonbridge is one of two principal urban areas in the borough, and it is inevitable that the settlement must make a contribution to housing needs in the Tonbridge/Sevenoaks housing market area.

A potential housing development prospect is indicated in the consultation document to the south west of the settlement. This includes sites at Manor Farm, Fishponds Farm and Land North of Haysden Lane (which is safeguarded for future development in the Development Land Allocations DPD) and together the allocations could deliver in the region of 800 – 900 homes.

Other development prospects include Land at Stock Green Road, and another large potential development prospect to the north west, concentrated on sites known as Coblands Nurseries and Tonbridge and Little Trench Farm. Much of the latter site is at risk of flooding and the implications of this for site layout means that the potential yield of the site is much lower than that indicated on the site assessment form.

Other land indicated in the draft Local Plan are two sites to the south east of the settlement titled 'land South of Vauxhall Gardens' and employment land to the east of the existing industrial estate.

Tonbridge has some significant valued landscape, biodiversity, flood risk, highway infrastructure and air quality development constraints. It is imperative that there is a continued focus on development within the existing urban area and the Council should be able to demonstrate a thorough site search that shows a willingness to assist with delivery of challenging sites. Although some greenfield development is likely to be necessary, the final choice of sites should be informed by transport modelling which will assist with understanding the impacts of development on the network. This is critical, particularly for development prospects at Manor Farm and Fishponds Farm to the south west of the settlement which are poorly connected to services within walking distance.

As has been stated previously in this consultation response, it is of great concern that development sites have not been considered and assessed using a detailed landscape character assessment, nor landscape sensitivity studies which are essential to understand the key characteristics of places, their special qualities and sensitivity to change. It is not really appropriate to plan urban extensions without this information.

Sites in Borough Green and Wrotham

Borough Green Garden City

A substantial amount of land has been proposed north of Borough Green and Platt for mixed development but predominately residential, named by the consortium of landowners as Borough Green Garden City (BGGC)

Paragraph 5.9.8 suggests that part of BGGC is a preferred site but gives no information in relation to the current use or sustainability criterion. The preferred area is an exhausted sand

quarry to the west of the A227 that is currently being back filled and used for the recycling of aggregates to the north of Borough Green.

Agents for the consortium of land owners have acknowledged that the greater site will not be available in the current plan due to continuing extraction to the east of the area. This prevents the road being built as shown on the plan from Darkhill to Nepicar Roundabouts.

This potential site to the west of the A227 would allow up to 1,000 dwellings but could only partially fund the proposed road from Darkhill to a new roundabout on the A227. This road reroutes traffic from the A25 west of Borough Green to the A20 via a new roundabout on the A227, the Whitehill Roundabout and the A20 London Road. The veracity of the financial claims made by the developer has not been subjected to viability testing.

The partial building of the road is extremely problematic as it stresses the traffic flows considerably on the primary road network until the final stage is complete in 15 to 20 years. This proposal was examined in detail at the Planning Inquiry into the building of a concrete block factory and bypass road that was designed to run in a similar fashion to the current proposal.

There are currently two schools that bring the A227 to a standstill for up to 20 minutes at school peak times. This was not the case in 2005 when the traffic movement were last investigated and came about with the building of a second school adjacent to Wrotham School.

The Whitehill roundabout cannot currently cope with traffic in the morning and evening peaks with a traffic queue backing up on the A20 that extends up Wrotham Hill and past the Tower Hill Factory Estate each evening. This is a queue on the approach to the roundabout of 2.5Km in length. There is a similar situation on the eastern arm of the A20 in the am peak.

The former Planning Inquiry asked for the three Highways Engineers to come to an agreed position as to the effect of building a road and factory and it was confirmed that the impacts on Whitehill Roundabout were unacceptable. That was in 2006 and the traffic increases year on year.

This current proposal would divert the primary road network and boost the traffic by the additional vehicle movements generated by 1,000 additional homes. Three Parish Councils have engaged the same expert Highways Engineers that provided evidence to the Planning Inquiry to provide independent expert traffic modelling of the proposal.

According to evidence presented to the previous Planning Inquiry into the bypass, it is apparent that the claimed traffic relief that the landowners make is unevidenced and the reality will be significant queuing several times of the working day. Slow moving and stationary traffic causes severe air pollution and much of Borough Green is already above allowed pollutant levels and is an Air Quality Management Area (AQMA). None of these possibilities have been evaluated by the LPA

The preferred proposal requires the building of an A class road through Ightham Sandpit which is now a beautiful wildlife area and formerly a restored sand quarry in the AONB. Any form of infrastructure development is intrinsically harmful and can only be considered if there is no alternative and exceptional circumstances are needed to justify the proposal.

TMBC has recently supported the East Facing Slips at J5 (M25) as the preferred means of providing traffic relief to the A25 corridor inc Borough Green in this plan term. Since there is an alternative and a much superior way to improve traffic flows in the greater area that benefits many more communities along the A25 past Sevenoaks, then there is no justification to build a road across a beautiful area in the AONB.

**TONBRIDGE & MALLING BOROUGH COUNCIL, PLANNING and
TRANSPORTATION ADVISORY BOARD, 15 November 2016**

1.4.5 The GIF has highlighted four schemes that can be brought forward during the life of LTP4.

- *M25/M26 east facing slips to alleviate movement restrictions;*

KCC is about to commence in February 2017 a £300,000 road scheme to improve traffic management in Platt, Borough Green and parts of Wrotham termed the BG-PLATT 9-Point Plan. Overall there are significant prospects of improved traffic management and combined with J5 Slips improvements then these measures will significantly alleviate traffic levels along the A25 and the problems of air pollution that have resulted in the area's AQMA status.

Ightham Sandpit has a thriving colony of Great Crested Newts and the whole of the ex quarry provides perfect habitat. They are a highly protected species and it is an offence to kill or cause damage to habitat. It was established at the planning Inquiry that a large area of land would be required as a receptor site for the colony to be translocated to if development takes place. This adds significantly to costs and makes the proposal potentially impractical.

Ightham Sandpit is the beautifully restored area of land in the AONB, adjacent to Darkhill roundabout that the road has to traverse. The earlier Quarry Restoration Order required that the profile of the road be raised to an appropriate level for the future building of the road. However when Celcon (H+H) accepted that the road had no extant permission they brought forward a variation of the planning restoration that left the quarry at a much lower level than previously required. Therefore considerable back filling would again be necessary to restore levels and this would take several years and that affects the site deliverability and add significant costs to the proposal.

It was also established at the Inquiry that the 'made ground' of Ightham Sandpit was heavily contaminated. If it is to be used as a public road then significant remediation is necessary. This is also possible but again adds significant costs.

The low profile of the land for the road, the contamination and the prevalence of a large population of GCN's will add significant costs to the proposal and the LPA has not provided a viability study which proves that the realisable housing of various tenures could subsidise the cost of the first stage of the road.

The landowner of Ightham Sandpit is H+H Celcon and it is their land that requires remediation and has a lower than necessary restored profile to build a road and also has the thriving colony of GCN's that would require additional land for translocation habitat.

The current proposal from the LPA does not include profitable development within their land holding as it's within the AONB. Therefore all the land would need to be compulsory purchased which would be an additional cost to the developer that again has not been considered or accounted for.

CPRE concludes that the land listed as potential housing development land, which is still being backfilled, should be considered for saving for a future plan after full site sustainability is completed. That should include reference to Landscape Character Assessments given that national footpaths on the North Downs overlook the area.

By that time the imminent program of traffic management measures and the anticipated improvements to the J5 Slips will be complete and a road traversing the AONB might no longer be necessary.

More importantly the LPA will have had opportunity to fully consider the proposal and come forward with a comprehensive Site Appraisal Assessment that includes viability studies which are lacking at present.

In short this proposal and its significant implications require far greater consideration and planning than is apparent to date, and then comprehensive and publicly informed consultation.

The Ex Wrotham Allotments, Howlands

This land was saved for housing development post 2021 in the 2007 LDF but became overgrown with briar and fly tipping and suffered from various forms of anti social behaviour.



On the basis that the land was available post 2021 in the current LDF at that time, the Parish Council rented the land under license and created an informal wildlife and wildflower meadow area for dog walking and picnicking. This required considerable investment in gates, seating, and fencing and regular land management.

CPRE suggests that the original policy in CP4 that allowed for release post 2021 in the event there was need should be adhered to in order to protect the investment of public money and current popular use of the area. This would allow the Parish Council to make alternative provision for this well used amenity by the time that development is possible.

Spring Tavern Industrial Site, A20 North, Wrotham

The area was the site of a Coaching Inn that declined with the building of the M20. The site has been unused for 30 years and its location between the A20 and M20 is impacted by severe traffic noise that makes it unsuitable for housing.

The Parish Council has suggested that the site is suitable for B1, B8 use with its excellent connectivity to the primary road network. There is an established exit onto Nepicar Lane, close

to the A20, but the entrance is opposite a popular pub restaurant that impacts that junction and highway safety with the greater use that the business park will cause.

The Parish Council has suggested that this potential industrial site should only be considered if a modest amount of the applicant's land is used to construct a roundabout. The north arm of the roundabout being Nepicar Lane that includes additional Business Park use, and the south arm being a combined entrance to the Moat, pub restaurant. This would enable the sub standard egress from the Moat to be closed. CPRE agrees with the Parish Council in this matter

Bushey Wood.

Bushey Wood has been saved land for development in the last two local plans. It is damaged land that wasn't required at the time due to the prevalence of brownfield land.

The site has no MGB or AONB constraints. However there are a number of other constraints and the current plan requires an Area Action plan prior to development that fully considers the following.

- *the protection and enhancement of any prevailing nature conservation;*
- *the need to conserve and enhance the Scheduled Ancient Monument;*
- *the prior evaluation of the archaeological potential of the;*
- *the need to avoid sterilising any viable mineral reserves within the area which have permission for mineral working;*
- *the need to protect the adjacent Site of Special Scientific Interest;*
- *the need to preserve or enhance the setting of the Friars and Aylesford Conservation Area;*
- *the need to identify and treat any areas of contaminated or unstable land;*
- *the need to protect the identity and character of Eccles village;*
- *the need to make adequate education, community, leisure and cultural provision;*
- *the provision of adequate access to the area avoiding the village of Eccles;*
- *the need to enhance the amount and quality of landscaping within and on the margins of the area, with the aim of mitigating the visual impact of development on both local and distant views;*

Bushey Wood has been saved by the previous plan Inspector for housing then the best outcome we can look for is careful monitoring of any emerging area action plan or Development Brief published as a SPD, to ensure that the listed constraints are adequately addressed.

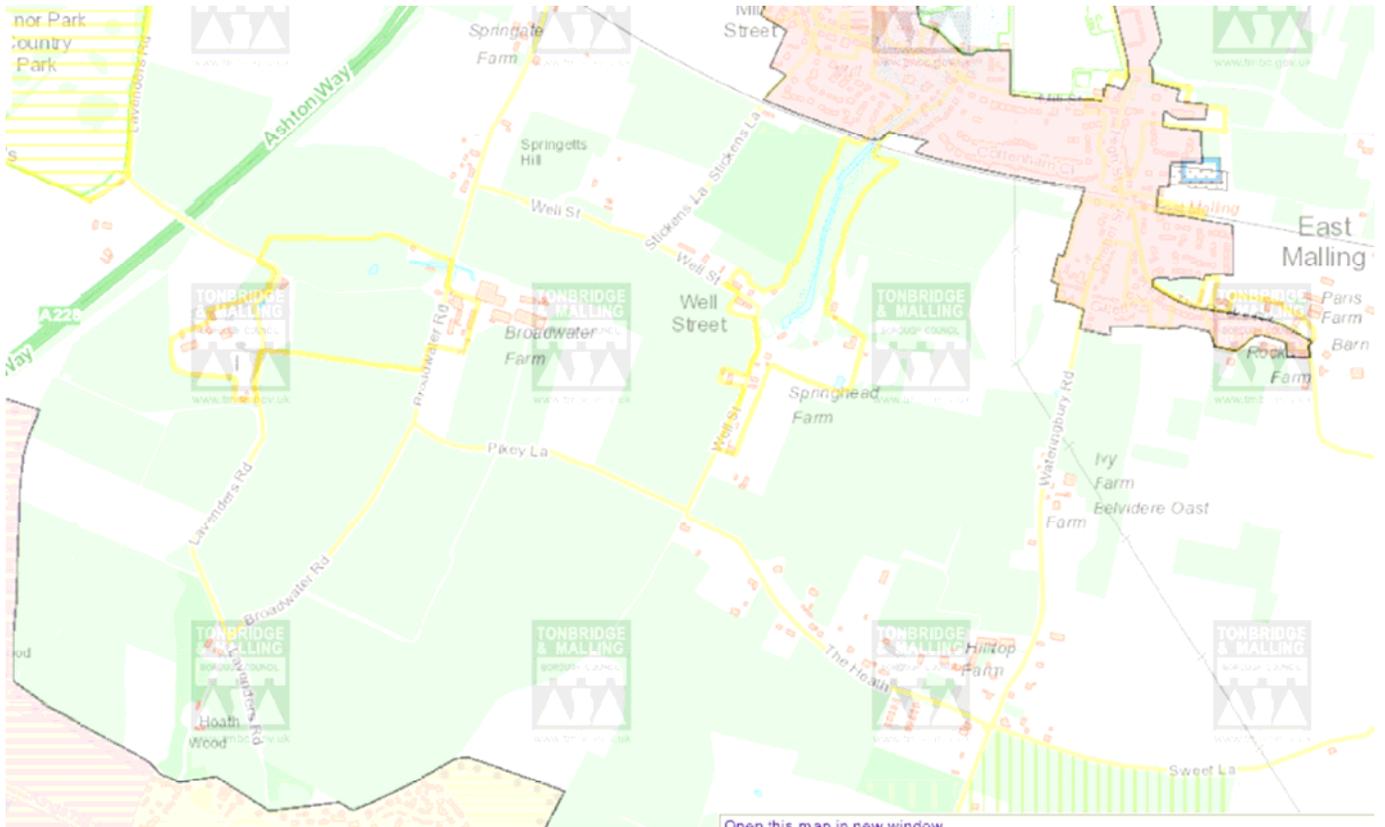
Broadwater Farm

The northern extension of built development to Kings Hill maintains the distinction between the settlements of Kings Hill and East Malling and development is sensitive to and does not encroach on, the Conservation Areas of New Barns and Well Street.

The area includes two pockets of woodland, Hoath Wood and Coalpit Woods and surrounding agricultural land but the LPA gives no information regarding its grading or quality.

The area has potential for some development subject to a full site sustainability study.

The map below shows the area under consideration with the two Conservation Areas to the north.



South Aylesford and Ditton

The area under consideration is free of MGB and AONB planning constraints.

However the area is heavily impacted by traffic congestion, particularly along hermitage Lane that effects access for emergency services to Maidstone Hospital. It is possible that a new road link from South Aylesford Business Park across Hermitage Lane could improve the currently poor road network. However this proposal requires careful consideration by Highways Engineers to investigate the full effects on the road network in advance.

The eastern block is an agricultural area to the south of Quarry Wood Industrial Estate and would surround but not encompass Deadman and Dog Kennel Woods

At this stage the area is worthy of further consideration in greater detail at the site sustainability stage.