PEMBURY PARISH COUNCIL

Working for Pembury People



Mr Stephen Baughen
Head of Planning
Tunbridge Wells Borough Council
Town Hall, Mount Pleasant Road
Tunbridge Wells
KENT TN1 1RS

15 November 2019

Dear Mr Baughen

Re: Tunbridge Wells Draft Local Plan

On behalf of Pembury Parish Council, I write to register its formal response to the Draft Local Plan ('The Plan').

As part of our considerations, we have consulted with local residents at a public meeting and invited them to complete a paper and online questionnaire covering the main issues emanating from The Plan as regards Pembury itself. Consequently, our response to The Plan reflects residents' main concerns and issues, as well as our own.

Strategy for Pembury Parish – Policy STR/PE1

1. Housing

We fundamentally <u>object</u> to the proposed target of 294-304 new dwellings, which we feel is excessive for our village. 90% of development falls within the Metropolitan Green Belt (MGB), which if lost cannot be replaced elsewhere within our parish. TWBC also do not propose to replace lost MGB elsewhere in the borough which we strongly object to. We do not accept that 'Exceptional Circumstances' exist to warrant loss of so much irreplaceable MGB.

89% of development within Pembury falls within the High Weald Area of Outstanding Natural Beauty (AONB) and is contrary to the aims of the AONB designation.

We would not want to see any significant number of houses being built without the essential <u>Infrastructure</u> being in place first.

For all of the allocated sites to be developed for housing, we would want Affordable Housing targets met (as indicated by TWBC) and conditions to ensure that those with a strong connection to Pembury are given a high priority.

We also object to the strategy for additional housing "through the redevelopment of appropriate sites and other windfall development in accordance with Policy STR1" being included in the strategy for Pembury. This would make the village vulnerable to unplanned development.

2. Infrastructure

Our overriding concern, shared by many residents, is that Pembury already suffers from an Infrastructure deficit, such that if some or all of the proposed sites were developed, Pembury would be unable to cope.

These are the main Infrastructure issues:

2.1. Roads and Traffic

We would remind you that in TWBC's Core Strategy Site Allocations Local Plan (July 2016), policy TP4 states: "Proposals will be permitted provided (inter alia) the road hierarchy and the function of routes have adequate capacity to cater for the traffic generated, and the traffic generated by the proposal does not compromise the safe and free flow of traffic or the safe use of the road by others".

Notwithstanding the proposed A228 Colts Hill relief road, and unspecified improvements to A21/A264 and A21/Hastings Road/Lower Green Road junctions, we remain concerned about the ability of the local road system to cope with the extra traffic generated by developments at Pembury, plus those proposed at Capel and Paddock Wood.

The Draft Local Plan for Capel and Paddock Wood includes the provision of over 6,000 new homes, employment, social and physical infrastructure (such as schools and health facilities) and retail development in Paddock Wood centre. These proposals will have very significant implications for transport along the A264, A228 corridor between Tunbridge Wells, Pembury and Paddock Wood. Additional homes in Pembury, focused behind the High Street and Hastings Road, will further exacerbate the problem.

The National Planning Policy Framework (NPPF) (February 2019) seeks to "promote sustainable transport and patterns of movements, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places" and the Parish Council does not believe that the Plan will deliver this requirement.

The A264 Pembury Road already suffers from severe traffic congestion at any time throughout the day, causing knock-on traffic problems for roads such as Pembury High Street, Cornford Lane and both the A21 and A228. It should be a pre-requisite that Pembury Road traffic congestion (with its associated pollution) is properly addressed before there are any new major developments in Pembury.

Extra traffic within Pembury will potentially impact on the safety of road users and pedestrians. We would like there to be well executed traffic calming measures, including speed restrictions by the Primary School.

We would dispute that there is capacity for the additional traffic generated by 300 new homes in this area. The existing road network currently compromises the safe and free flow of traffic and therefore the additional traffic movements caused by the new homes will only make the situation worse.

The junction of Hastings Road and the A21 at Bo Peep Corner is a notorious accident blackspot. Insufficient signage for the entrance at the junction may have played a part in the recent fatality after a road traffic accident. Speeding vehicles through the village are a regular occurrence. Additional houses here will compromise road safety to an unacceptable level.

Problems on the A21 inevitably lead to rat running through the country lanes in and around Pembury such as Kings Toll Road and Romford Road. The current problems experienced here will get significantly worse as a result of the proposed developments and mitigation must be put in place to address this problem.

The Development Constraints Study (p.15 Section 3.3) states that no evidence has been collated on how the highways capacity could impact on the development strategy. As such a large proportion of the proposed development is concentrated in the North East section of the borough, which includes Pembury, we believe that knowing the impact on the highways network, and planning for its mitigation, is of paramount importance. The Parish Council are surprised that this critical piece of evidence has not been undertaken before proposing over 6,000 new residential homes in the area.

We note that the proposed Colts Hill Bypass joins the existing A228 at the junction with Maidstone Road to the north of Pembury village. The cumulative effect of traffic generated from Colts Hill to the A21 from the large proposed developments in Capel and Paddock Wood and elsewhere needs to be modelled to show the impact on the A21 junctions and Woodsgate Corner before we can comment further.

The Parish Council is also concerned about the ability of ambulances to safely negotiate around congestion at Woodsgate Corner and the A21 slip roads with such significant amount of development proposed. The hospital has major Accident and Emergency and Trauma units for a wide geographical area and access must be maintained at all times.

2.2. Air Pollution

Most of the proposed housing will back on to A21 and be affected more with poor air quality than existing houses. It is also likely that increased traffic from the additional development in Pembury, Capel and Paddock Wood will lead to increased air pollution. Stationery traffic at Woodsgate Corner will also contribute to the problem.

The Parish Council request that current base line air quality is assessed, particularly at Woodsgate Corner and along the A21, in order to monitor the air quality in future.

2.3. Parking

There is currently a dire shortage of on/off street car parking available within Pembury, which discourages people from being able to make use of various outlets so trade is affected. Any new housing developments should provide sufficient car parking for their new occupiers which should comply or, preferably, exceed the Kent Design Guide Interim Guidance Note 3. Car ports and car barns should be avoided. Pembury is a rural village and residents rely on their cars.

We would like to see additional parking created at the Village Hall and the Hospital as overspill parking from both sites currently creates significant problems on Pembury High Street and adjacent roads.

2.4. Medical Facilities

An inevitable consequence of so many extra households would be additional pressure on the already limited local medical resources. We hear complaints from residents about the difficulties of booking an appointment at present. Therefore, our G.P.s will need additional funding to extend their current surgery by 2 or 3 consultation rooms and associated additional staffing requirements.

The Hospital struggles to service West Kent's swelling populace, demand may accelerate unsustainably when one factors in the effect of the Capel and Paddock Wood developments. Current waiting times are at unacceptable levels, with stories of patients already sleeping in the corridors when the hospital is under pressure. The most recent Care Quality Commission (CQC) report published in March 2018 states that "from August 2016 to July 2017 the trust reported 364 "black breaches" (at Tunbridge Wells Hospital), with an upward trend over the period. A **black breach** is said to have occurred when the emergency department is unable to take over the care of a patient and release the ambulance crew to attend other jobs within 60 minutes of their arrival. It goes without saying that the hospital will require significant investment into the expansion to cope with the increased population.

2.5. Schooling

Pembury's Primary School should be consulted to ensure they can cope with the growth in population proposed and that their needs are met. Any increase in pupil numbers will have a negative impact on road safety and parking and mitigation measures are required. The proximity of the school to the junction from Church Road onto Maidstone Road is also a concern especially if the proposed development (PE4) at Downingbury Farm is accessed via Church Road.

2.6. Public Transport

Local bus services are insufficient to encourage less car usage in a rural village, they need to be more frequent, with better services to run later into the evening. Existing services stop before 7pm Monday to Saturday and by 4pm on Sundays.

The Parish Council supports a workable Park & Ride solution for Tunbridge Wells, at Woodsgate Corner as per the current TWBC land allocations, which is a critical location on a radial route into the town centre.

2.7. Sewerage

We are concerned that the large number of houses planned for sites PE1, PE2 and PE3 could overstretch Pembury's existing sewerage system which has already shown some signs of strain. An assessment of required capacity is essential prior to development commencing, and if there is a deficit in the current system this will need to be addressed.

2.8. Retail

The Sustainability Appraisal (p.94) refers to the "loss of a local supermarket" which is of significant concern to the Parish Council and Pembury residents. If this goes ahead, it will result in further car journeys inevitably using the Pembury High Street / A264 junction which is already very congested. Residents strongly supported keeping a supermarket at the Tesco site when answering the Parish Council's questionnaire. Many elderly residents do not drive and need to walk to the shops. If the supermarket were to go, then provision of better public transport to alternative shops would be required.

2.9. Cycling

Pembury Parish Council <u>object</u> to the permanent cycle lane proposed along the High Street. If this is implemented, on-street car parking will be reduced and aggravate an existing problem which would be made worse with additional development.

2.10. Sport and Recreation

The Parish Council are particularly concerned at the suggestion that S106 contributions from Pembury would be diverted to the mooted Hawkenbury Sports Hub and other recreation and play areas on the site. Both the Parish Council and Pembury Athletic Youth Football Club (PAYFC) consider this site would be unreasonably difficult for Pembury children to access as it is located on the opposite side of Tunbridge Wells.

Please find attached comments from PAYFC (Appendix 1) which highlights the problems that would occur. Every route that children could use to travel to the sports hub and recreation grounds is notoriously congested. The A264 into Tunbridge Wells; Halls Hole Road; and Cornford Lane, which is a narrow, often single track, rural lane renowned as a rat-run, will only be made worse by the significant

development proposed in this part of the borough. Therefore, contributions for sports and recreation provision for Pembury residents should focus on Pembury itself.

Current sport provision in Pembury is oversubscribed and it is vital that more is provided in Pembury to mitigate against the additional residents living in the village as a result of the proposed development.

2.11. Environmental issues

The Parish Council want TWBC to pay high regard to measures to mitigate against the Climate Emergency in their Local Plan. The NPPF requires that the planning system should "support the transition to a low carbon future" and "contribute to radical reductions in greenhouse gas emissions". All development should be required to support this aim.

3. Section 106 Contributions

We completely support the principle of developers being required to mitigate the impact of their developments by making appropriate Section 106 contributions. The Parish Council consider that developers should be obliged to make a contribution rather than this be an expectation. We are also concerned that developers will try to avoid many contributions due to "lack of viability" which has been the case in the current planning application for the Sturgeon's site (PE5).

As so much of the development is proposed in this part of the borough, Pembury Parish Council believe that the majority of S106 contributions should be focused here to mitigate against the development.

For such developments that might proceed within Pembury, we would particularly want to include the following as beneficiaries of Section 106 contributions:

- 3.1. Highways Improvements particularly at the A21 junctions, Woodgate Corner and Bo Peep Corner.
- 3.2. Primary School Education
- 3.3. Contribution for Secondary School education
- 3.4. Health and medical facilities
- 3.5. Provision of amenity/natural green spaces; children's and youth play spaces within Pembury
- 3.6. Improvements to public woodlands within Pembury
- 3.7. Improvements to public transport provision
- 3.8. Improved sports and recreation facilities within Pembury.

4. Allocated Sites

Taking each allocated site in turn, our comments are as follows:

4.1. AL/PE1 Land Rear of Pembury High Street

The main problem here is determining the most appropriate access to Pembury High Street. Although there is a suggestion that this could be via the narrow driveway to the Village Hall (in combination with no 51 High Street), please note that the Parish own that existing driveway and would not consider allowing access along it to the land behind on safety grounds. (The Village Hall Management Committee have met and would also object in principle to such a plan, they would rather see access via 55 High Street, with additional car parking for the Hall created at 51 High Street if that house is demolished. They do not want additional parking created behind the Hall. See Appendix 2 for their response.)

The Parish would support shared use of any such additional car parking accessed at 51 High Street, with say 50% for use as limited car parking for the public. However, consideration of pedestrian safety must be paramount.

Overall, we abhor the loss of MGB and inappropriate development in the AONB, we think the proposed density of housing is too high, and because of these factors and the significant concerns about the impact onto the existing road network, we <u>object</u> to the site being allocated.

4.2. AL/PE2 Land at Hubbles Farm

Again, the suggested access point is problematic as it is opposite Belfield Road which is a dangerous junction. The sight lines are not good and egress from the site to the narrow Hastings Road is dangerous.

There is currently only 10-15 years, approximately, left at Pembury Burial Ground and therefore we strongly support that land is to be safeguarded for an extension of the cemetery.

Overall, we abhor the loss of MGB and inappropriate development in the AONB, we think the proposed housing density is too high, and because of these factors and the significant concerns about the impact onto the existing road network, we <u>object</u> to the site being allocated.

4.3. AL/PE3 Land south and west of Hastings Road

It is not clear where the access point(s) would be, but it seems imperative that the A21 junction (with Hastings Road and Henwood Green Road) is completely remodelled to allow for safe egress and access of the proposed development site.

We abhor the loss of MGB and inappropriate development in the AONB, we think the proposed housing density is too high, loss of open space amenity would be

regrettable, also we do <u>not</u> want to see business use on the site, so we <u>object</u> to the site being allocated.

4.4. AL/PE4 Land at Downingbury Farm

We are unclear about the exact positioning on the site of the residential and business use buildings, and their respective points of access. We note the safeguarding of some MGB land for possible future expansion of the Hospice.

There are concerns that the residential dwellings would be accessed off Church Road. The top of the road is narrow with cars parked either side and is close to the Primary School. This junction is also a blackspot for accidents. Subject to satisfactory access, we are neutral about this site.

4.5. AL/PE5 Land at Sturgeons

Given that planning permission has already been granted for housing on this site, we find this allocation <u>acceptable</u> provided that the stated Affordable/Social Housing quotient is included.

4.6. AL/PE6 Land at Tunbridge Wells Hospital

We recognise that in coming years there could be a need for a variety of hospital linked uses of the undeveloped parts of this site, which we note would remain in the MGB. Such <u>acceptable</u> uses could include key worker accommodation, hospital expansion, clinical facilities, medical research/education centre, additional parking and a public transport hub.

4.7. AL/PE7 Woodsgate Corner

TWBC will be aware of the overwhelming public opposition to the proposed use of this site for a huge car showroom and workshop complex.

Pembury Parish Council has strongly <u>objected</u> to the current planning application (*see Appendix 3, email dated 17 May 2019 to Planning Support*), which has been 'called in'. Our principal objection (which the majority of individual objectors also cited) is the inevitable extra traffic congestion this plan would create in the locality, particularly in Pembury Road but also Pembury High Street and Cornford Lane. We also expressed concerns about access to and egress from the site; increased vehicle emissions; insufficient car parking; also noise nuisance for nearby residences.

We share the concern of many, that if the car dealership is permitted, then Tesco will vacate its part of the site, which would leave Pembury without a significant asset. The Loss of the local supermarket is already mentioned in the Sustainability Appraisal and is a major concern.

Crucially the undeveloped land remains allocated for Park and Ride in the current Local Plan, and both we and K.C.C. (please refer to their recent Transport Assessment) believe it should remain so in order for current congestion to be improved into Tunbridge Wells. Our clear view is that a car dealership complex is a wholly unsatisfactory allocation for this site, such a business would be far better sited on North Farm in company with other such dealerships.

5. In Conclusion

Whilst we understand that TWBC is in a difficult position trying to allocate sites to match arbitrary Government imposed targets for housing, we do not wish to see Pembury's fragile infrastructure overwhelmed by an unsustainable, excessive allocation of housing.

We have objected to the significant loss of irreplaceable MGB that would be incurred should some of these developments proceed on the basis of the suggested allocations and consider it would be inappropriate development in the AONB.

We have significant concerns about the highways network's ability to cope with increased traffic and the lack of strategic planning to mitigate against the proposed development in the Draft Local Plan.

Where any new housing is permitted, we would want the essential Infrastructure to be in place first, for issues such as density, access and egress, traffic etc to be fully considered. Wherever possible, the relevant sites should include public open spaces and the environment protected and enhanced (e.g. with landscaping and tree planting).

In order to address climate change issues, building plans need to include clear and definite ways in which developers build for the future. Renewable energy is a major issue and various heat sources need to be essential planning requirements, not just suggestions.

Pembury is still a clearly defined village; it would be an irreversible mistake to allow ill-considered developments (such as at Woodsgate) that would have the effect of Pembury losing its identity and becoming a suburb of Tunbridge Wells.

We understand that the new housing development planned by TWBC includes approx. 300 new homes in the immediate Pembury Village area.

Again, we understand that the Section 106 funds arising from such a development which would be allocated for Sporting and Recreation are not to be allocated to Pembury but rather to a quite separate facility within the Borough at Hawkenbury. Our views on this proposal are as follows;

- Pembury AYFC has been established since some 37 years and is the main and only Youth Football facility for the village with topically some 250 children aged between 5 and 18 as members. So already touching some 400 plus family members. The new development will undoubtedly provide even more young people needing to be offered recreational opportunity in Pembury.
- Presently this opportunity is provided on two sites, the first at the communal Pembury Recreation Ground, available at weekends and Woodside Recreation Ground similarly available at weekends.
- To propose that this opportunity for existing and future children of the Village can be offered elsewhere, in this case some 3.9 miles away shows absolutely no appreciation or understanding of what lies within the 3.9 miles in question.
- Any reference to Highway information will show that the main route to Hawkenbury from Pembury is the A264 and is already highly congested and a source of much disquiet and a significant reason for people to avoid Tunbridge Wells.
- The idea that creating improved sports facilities for additional families in Pembury along an already congested route is quite frankly ridiculous.

There are however extensive and significant improvements that can be achieved by making funding available to the, highly necessary, facilities at Woodside Recreation Ground.

- The location of Woodside Recreation Ground will in fact be hard by a major portion of the proposed new development.
- Woodside has significant scope and importantly space for improvement.
- The existing pavilion has, largely due to lack of funds, become shabby, as any
 inspection will confirm, and is no longer sufficient for purpose in the present
 climate. There is an urgent requirement for disabled toilet facilities. There is a
 ladies toilet but due to lack of space is also used as an additional storage
 facility.

- We now have a Girls Age group and Women's Football is an ever-burgeoning aspect of football today and one in which we intend to play our part. Woodside Pavilion is unsuitable for Women's Football.
- There is no provision for any form of refreshments or a kitchen facility which these days is regarded as a must as we wish to make Pembury Football a welcoming venue for other Villages and Towns.
- As a Club we have ourselves made significant financial outlay to pitch improvements at Pembury Recreation Ground with very positive results as confirmed by Kent Football Association.
- Woodside, catering as it does for older age groups, now needs urgent financial commitment to ground improvements.

In summary Pembury has both an existing and growing need for financial investment in its Sports and Recreation offering and we would require such funds, as become available under Section 106, to be used directly for the Pembury Community.

Policy Number: Policy AL/PE 1, Land rear of High Street and west of Chalket Lane.

- 1] Pembury Village Hall Management Committee (PVHMC) notes the proposal to allocate a combination of existing land plots for a mixed use housing scheme with 70-80 dwellings, a community facility and extended village hall public parking. PVHMC also notes that the site of 51 High Street, adjacent to the village hall, is included in the draft policy.
- 2] Clearly the proposed development will require significantly improved vehicular access on to the High Street. PVHMC would object in principle to any scheme which seeks to use part of the village hall land to create a new access road. It would be much safer if the access to the houses was well away from the hall entrance through the site of 55 High Street. A combined access to both the hall and the new houses incorporating the site of 51 High Street would be unsafe and impractical for users of the hall.
- 3] PVHMC welcomes the intention to provide extended village hall public parking as part of this proposal. This extended provision should be on the site of 51 High Street in combination with the existing parking facilities at the front of the village hall. This could create enough land for a car park with around 40 spaces which would be a considerable improvement on the existing facility. It would significantly reduce the disruptive and often illegal on-street parking in the High Street which currently occurs during larger events at the village hall.
- 4] The east/west boundary behind the village hall and 51 High Street [the limit of the Conservation Area] should be retained to provide separation from the new housing development and ensure as far as possible that the car park does not become an overspill parking facility for the new residents. The car park should only be available for users of the village hall. PVHMC would be opposed to a car park extension on land at the rear of the village hall as this would be too far from the main hall entrance and would also be very difficult to manage.
- 5] PVHMC notes but does not consider there should be a requirement for a contribution towards improvements to pedestrian access serving the village hall, which is perfectly adequate at present. However, if the car park was extended as outlined above, then a footpath from the High Street to the front doors of the village hall could usefully be included as part of the scheme.

Subject: 19/00884/FULL - Development of a Motor Village Car Dealership

19/00884/FULL - Development of a Motor Village Car Dealership and Minor Alterations to Tesco Foodstore Car Park - Land Adjacent Tesco Car Park Cornford Lane, Pembury

On behalf of Pembury Parish Council, I write to register their overwhelming and unanimous objection to the above application, which was discussed at this month's Full Council meeting.

1) The principal objection relates to the inevitable extra traffic congestion along Pembury Road, which at many times of the day is at full capacity so that gridlock often ensues. The extra vehicle movements forecast in the morning and evening rush hours are very concerning, however we suspect that they underestimate what would occur in reality. With no imminent prospect of improvements to Pembury Road (such as a roundabout at Halls Hole Road junction, or additional lanes), it simply lacks the infrastructure to take more traffic. Traffic generated from the likely future expansion of both Pembury and Paddock Wood, will serve to exacerbate this problem. Any major new developments (such as the Motor Village) along the line of the Pembury Road should not be granted whilst there is an infrastructure deficit.

Since we understand that the emerging Local Plan will contain a Transport Assessment, it is important that the Planning Committee and the Parish Council are given access to the most up to date site specific surveys integral to that Assessment, so that both parties can better judge the likely traffic impact of this proposed development.

We are also concerned about the effect of the resulting extra traffic on other local Pembury roads, such as Cornford Lane and Pembury High Street. Please note that we have contacted Greg Clark M.P. who has recently requested that KCC carry out its own Highways Assessment, not just for Pembury Road but also for the Cornford Lane/Halls Hole Road rat run which tends to suffer whenever Pembury Road clogs up.

- 2) We are concerned about the access to and egress from the site, which will be shared with Tesco related traffic. The roundabouts on the adjacent stretch of Pembury Road are often gridlocked, and we perceive that additional traffic, including large Hendy delivery vehicles and transporters, will struggle and add to the melee.
- 3) It seems inevitable that there will be marked increases in vehicle emissions, both within the site and on its approaches.

4) We are not convinced that there will be enough car parking available on the overall Hendy/Tesco site. We anticipate that drivers will inevitably look to park on other streets in the vicinity (in fact this already occurs), causing further obstruction on Pembury High Street and inappropriate parking in nearby residential roads. We are concerned that Tesco customers will find that the spaces nominally reserved for them are taken by Hendy's clients and staff, and the loss of trade will drive Tesco away, despite the supermarket being a major asset for Pembury. (An associated issue is that the current lack of sufficient parking at Tunbridge Wells Hospital, is encouraging some hospital staff and visitors to park within Tesco's car park or residential roads in Pembury.)

We also note that over 100 parking spaces are included within the red line of the application but are allocated for Tesco customers. Presumably this will entitle the motor dealerships to have a right over those spaces, with the potential to further reduce parking spaces for Tesco customers and exacerbate problem parking in the village.

- 5) Crucially, the land concerned is pre-allocated in the current Local Plan for park and ride, with its aim to reduce traffic congestion into Tunbridge Wells town centre, not a mammoth car dealership complex. (It seems inconceivable that the Planning Dept. could even consider this major application before the draft Local Plan has been published.) Moreover, the site falls within an AONB, and abuts the Green Belt. The sheer scale of the development is inappropriate for the site, and we are concerned about its impact on the AONB, with loss of trees and scrubland parallel with Cornford Lane and towards the A21.
- 6) There is potential nuisance for those living in a rural setting nearby particularly regarding noise from vehicles manoeuvring and workshop machinery used on the site. It would be far better if the development fell within a true brownfield site such as on North Farm, where many other dealerships are sited. (We note that in another submission it is claimed that there is an economic benefit to Pembury; we do not agree with this, since in reality most of the jobs would be for existing Hendy staff travelling to Pembury.)
- 7) Should the Planning Committee, however perversely, be minded to grant this application, we would wish to seek a significant Section 106 contribution towards highways improvements in the locality. (We note it has been suggested in another submission that such a contribution be used in part to make the cycle lanes in Pembury High Street permanent, thus removing on-street parking. We do not support this idea, as it would remove essential parking for a variety of residential and business users, who would otherwise be tempted to relocate their vehicles to purely residential side roads)

In summary, we urge the Planning Committee to Refuse this Application, which we feel is wholly inappropriate for the site, and for Pembury. The Parish Council's position is fully supported by our Borough Councillors and our County Councillor.