

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

11 May 2021

Dear Mr Baughen

Re: Tunbridge Wells Draft Pre-Submission Local Plan

On behalf of Pembury Parish Council, I write to register its formal response to the Draft Pre-Submission Local Plan ('The Plan'). This response largely follows the text of our comprehensive response to the earlier Draft Local Plan; however, we have made changes where we feel it is appropriate:

Strategy for Pembury Parish – Policy PSTR/PE1

1. Housing

We do not agree with the proposed target of 254-264 new private dwellings, which we still feel is somewhat 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 readily accept that 'Exceptional Circumstances' exist to warrant loss of so much irreplaceable MGB which the borough should be seeking to protect not sacrifice.

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. It is essential that developments on allocated sites previously in the MGB/AONB should be developed in line with adopted High Weald AONB Beauty Design Guide with housing densities appropriate for MGB/AONB land.

We would not want to see any significant number of houses being built without the essential infrastructure (see (2) below) 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 in The Plan) and conditions to ensure that those with a strong connection to Pembury are given a high priority.

The embryonic Neighbourhood Development Plan (NDP) for Pembury will focus on such important issues as housing design and master planning for the relevant allocated sites.

Whilst the Parish Council (also the NDP) have no intention of suggesting additional or alternative sites for allocation, in future we would wish to see brownfield sites in the borough given preference over sites in MGB/AONB for housing 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. Such infrastructure shortfalls need to be fully assessed in advance, and resources found to remedy them.

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".

We would welcome the proposed A228 Colts Hill relief road if built, and the highway improvements 'along the A228/A264 junctions, including junction capacity improvements at Woodsgate Corner, and a roundabout at Pembury Road/Halls Hole Road/Blackhurst Lane'. Nevertheless, we remain concerned about the ability of the local road system to cope with the extra traffic generated by developments at Pembury, plus those very significant developments proposed at Capel and Paddock Wood.

The Draft Pre-Submission 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 seem destined to 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. Pembury Road traffic congestion (with its associated pollution) needs to be properly addressed (e.g. by the afore-mentioned Woodsgate Corner improvements and Pembury Road roundabout in lieu of Halls Hole Road traffic lights) 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 official 20 mph speed restrictions by the Primary School, possibly extended throughout Pembury.

We would dispute that there is capacity for the additional traffic generated by over 250 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.

We note that the possible full route of the Colts Hill Bypass would, if built, join 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 remains 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 (*sites PE1, 2, 3, also PE6) will back on to the A21 and be affected more with poorer 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. Stationary traffic at Woodsgate Corner will also contribute to the problem. The Parish Council request that current base line air quality is assessed (in post lockdown normal times for accuracy), particularly at Woodsgate Corner and along the A21, in order to monitor the air quality in future.

*These sites are also likely to be affected by noise pollution mainly emanating from the A21, such that environmentally friendly buffer zones should be incorporated in order to mitigate this as far as possible.

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 with or, preferably, exceed the Kent Design Guide Interim Guidance Note 3. Pembury is a rural village and residents rely on their cars.

We would like to see additional parking created near the Village Hall (site PE1 suggests up to 30 spaces, but this may not be enough for future demand) and at the Hospital* as overspill parking from both sites currently creates significant problems on Pembury High Street and adjacent roads. (*We note the current undetermined application for a training building alongside the Hospital if, as it appears, there is insufficient parking, will only exacerbate parking problems in the vicinity of the hospital).

2.4. Medical Facilities

An inevitable consequence of so many extra households (plus all the residents who will occupy the proposed care type homes) would be additional pressure on the already limited local medical resources. We are concerned that there has not been enough research in regard to the number of new patients generated and what extra medical facilities will be needed. We hear complaints from residents about the difficulties of booking an appointment at present. We surmise that our GPs will need to extend their current surgery by two or three consultation rooms and associated additional staffing requirements, all of which will require extra funding.

The Hospital struggles to service West Kent's swelling populace and demand may accelerate unsustainably when one factors in the effect of the Capel and Paddock Wood developments. Current waiting times are at unacceptable levels, not helped of course by the Covid pandemic.

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 as the proposed development (PE4) at Downingbury Farm would be 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 a Sunday when there is a greatly reduced service.

2.7. Sewerage

We are concerned (as are local residents) 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. Also, development of site PE4 could exacerbate the sewerage problems already existent in the lower part of the village.

Additionally, there have been concerns expressed about surface water drainage issues, particularly at site PE3 which is difficult to drain. It is therefore essential that in-depth assessments of required sewerage and drainage capacity is carried out prior to development commencing, and if there is a deficit in the current systems this will need to be addressed.

2.8. Retail

As stated in our response to the Draft Local Plan, it is imperative that Pembury retains its local supermarket at Woodsgate Corner; there was much concern about its future should the motor village proposal have progressed.

2.9. Cycling

We note favourably the proposal for an east-west cycle route through allocated sites PE1, PE2 and PE3, with safe access and egress with regard to junctions with the road system.

2.10 Sport and Recreation

The Parish Council is particularly concerned at the suggestion that Section 106 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.

PAYFC have previously commented on 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, are most likely to 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 ideally focus on Pembury itself.

The Plan's Overview acknowledges the lack of sufficient open space, sport and recreation provision within Pembury. It is vital that the Borough addresses these issues bearing in mind the extra demand from new residents living in the village as a result of the proposed developments. (See comments below about loss of open space in site PE3)

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".

As so much of the development is proposed in this part of the borough, Pembury Parish Council believe that the majority of Section 106 contributions should be focused within our parish 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; improvements to cycle routes and speed reduction initiatives **within Pembury**.
- 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 updated 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. There had previously been a suggestion that this could be via the narrow driveway to the Village Hall (in combination with no. 51 High Street), we would reiterate that the Parish own that existing driveway and would not consider allowing vehicle access along it to the land behind on safety grounds.) We note that the Site Layout Plan now shows an indicative vehicle access point at 55 High Street, this being the Parish's preferred access point, but it is understandable that the precise location needs to be informed by a traffic assessment.

We are pleased that the site now has additional parking provision of c.30 spaces, but would prefer more to satisfy future demand, to serve the village hall and wider public, with separate pedestrian access to the High Street. We also favourably note that the proposed density of housing has been reduced and that an east-west cycle route is proposed, which we regard as essential.

Nevertheless, we still regret the loss of MGB and development in the AONB and retain significant concerns about the impact onto the existing road network.

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.

We strongly support the intention that land is to be safeguarded for an extension of the cemetery. We favourably note the small reduction of the proposed housing density and that, if feasible, an east-west cycle route is proposed.

As before we regret the loss of MGB and development in the AONB and retain significant concerns about the impact onto the existing road network.

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

It is still not clear where the access point would be, but as previously stated 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 favourably note the small reduction of the proposed housing density and that, if feasible, an east-west cycle route is proposed. The Site Layout Plan seems to show a proposed open space and landscape buffer. We would want this area safeguarded given that at present the majority of the land has for many years been informally used for recreation by the local community.

We regret the loss of MGB and development in the AONB, moreover any significant loss of open space amenity would be unacceptable.

4.4. AL/PE4 Land at Downingbury Farm

We favourably note that there is no longer any business use proposed on the site, replaced by the safeguarding of some MGB land for possible future expansion of the Hospice.

There are still concerns that the residential dwellings would be accessed off Church Road. The precise access point will need to be chosen carefully.

4.5. AL/PE5 Land at Sturgeons

Given that planning permission has already been granted for housing on this site, with work seemingly about to start, we make no further comment.

4.6. AL/PE6 Woodsgate Corner

Bearing in mind the overwhelming public and Pembury Parish Council opposition to the original proposed use of this site for a huge car showroom and workshop complex, we were naturally delighted when TWBC refused the associated planning application.

We reluctantly accept that the site will not remain undeveloped and that there does not appear to be an economic case for part of the site to be used for Park and Ride. In this circumstance the proposed allocation for specialist housing for older people and others with care needs is definitely preferable. Even so, we have some concerns about traffic generation in an already congested area, so it is essential that the conclusions of the proposed traffic assessment should be taken into account when determining suitable mitigation measures for the transport network.

4.7 AL/PE7 Land at Cornford Court

Given that planning permission has already been granted (albeit no work yet commenced), we make no comment beyond recording that we objected to the application.

4.8 AL/PE8 Owlsnest, Tonbridge Road

Given that planning permission has already been granted, we make no comment.

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 resent the significant loss of irreplaceable MGB that these allocations represent and the lack of relevant mitigation within the parish.

We have significant concerns about the highway network's ability to cope with increased traffic (generated by developments in Pembury, Capel and Paddock Wood) and the lack of strategic planning to mitigate against the proposed development in the Draft Pre-Submission 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.

The NDP for Pembury, once adopted, will supplement the Local Plan and hold developers (and the Borough as the Planning authority) to account in respect of future developments in our parish. Development on sites previously within the MGB/AONB should be developed in line with adopted High Weald AONB Beauty Design Guide with housing densities appropriate for MGB/AONB land.

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

Yours sincerely

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Helen Munro
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