

**STATEMENT FROM AYLESFORD PARISH COUNCIL TO THE EXAMINATION
OF TONBRIDGE AND MALLING BOROUGH COUNCIL LOCAL PLANN**

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.

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 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 would comment on the strategic housing sites at Bushy Wood and South Aylesford as follows:-

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). However, the Plan proposes not what the Parish Council would describe as an Area of Opportunity for some limited development but 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 rural area. This Council believes that this increase in size cannot be justified and that this area is simply not suitable for any further housing development. The Visual Impact of this proposed massive development on the landscape, particularly as seen from the North Downs, far outweighs the benefits gained from this development and this statement is backed up by some of the information set out in Tonbridge and Malling Borough Council's own Landscape and Visual Impact Appraisal. Additionally, the increased infrastructure issues such as significantly increased traffic movements arising from this development appear to be far greater than the proposed infrastructure benefits which it could be argued do not satisfy the demand raised by the new development itself.

The proposed new road infrastructure improvements for this scheme seems to do nothing for improving the access to the motorway network, Medway, Maidstone and the Maidstone Hospital, and all it achieves is to provide accelerated progress to an already over capacity and heavily congested existing road network. The village would be better served by the implementation of a smaller and more localised road infrastructure improvement such as traffic calming and no further development.

The Council would not wish to see any development at this site as proposed in Policy LP27 but if it was felt some development was needed the Council would wish to see it in a more limited format and without the inclusion of the further development of 614 dwellings as set out in the further Area of Opportunity for this site. The Council would also consider it obligatory to see the necessary infrastructure to support this development as set out below:-

- 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. Kent County Council have recognised the importance of the A229 having just started consultation on improvements to this road and its junctions with the M2 and M20 as well as increasing lane capacity to 3 lanes on the southbound carriageway to Maidstone. This clearly recognises the necessity for improvement to the Pilgrims Way as a link to the important through route of the A229 is improved.
- 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.

P28: 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 as a development in this plan 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 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.

This Council is extremely disappointed that the application for 840 dwellings on this site has been approved by Tonbridge and Malling Borough Council before this Hearing has had the opportunity to consider the necessity of the inclusion of this site in the Local Plan. The Council believes this site is a very important part of the Tonbridge and Malling Borough Local Plan and that any consideration of the allocation of housing at this site should be determined through the Local Plan process and not by Tonbridge and Malling Borough Council in response to a current shortfall in their current housing provision. This site is too important for determination by Tonbridge and Malling alone and must go through the full Local Plan process.

The Local Plan Inspectors have asked Tonbridge and Malling Borough Council to comment on whether any of the 5 housing strategic sites had the issue of a lack of infrastructure prior to inclusion in the Local Plan. This area is clearly one where there have been issues of significant infrastructure problems principally along the A20 but also along Hermitage Lane with already granted housing sites in the Maidstone Borough area. The A20 has suffered severe congestion for many years going back well beyond the life of this Local Plan. The problems on the A20 and now Hermitage Lane has caused significant access problems to Maidstone Hospital for emergency vehicles and people needing to attend at the Hospital. This new development is being asked to fund a new roundabout at the Quarrywood Industrial Estate, which is much needed, but at the cost of significantly higher traffic numbers arising from the development itself. This position has been made worse by the likely expansion of the Allington Incinerator and the provision of a waste recycling centre at the same location at the 20/20 industrial estate.