

**Application (C): Consultation Responses**

1.1 Kings Hill PC: Objects for the following reasons (reproduced in full):

1.1.1 Concerns are maintained over the further loss of land allocated for employment. Whilst the marketing of this site is noted, this appears to be only of very large office spaces, even if the building is subdivided for more than one occupier. We are aware of the popularity of Churchill Square and the new building (Building 80) constructed in 2017 which we understand is fully let. This provides small suites for small and/or start-up businesses for which there appears to be significant demand. With today's business practise typically requiring smaller office spaces on shorter leases for flexibility, we therefore question whether the marketing of such large units sufficiently demonstrates that there is no demand for commercial use of this land, or just no demand for the large units that were marketed.

1.1.2 There are significant concerns over the additional traffic that this site together with the other applications cumulatively will generate where accessed through Kings Hill. Even as phase three now begins to be built out and these proposed new sites, there are of course still only two means of access and egress for the ever increasing number of residents. Whilst the A228 is dual carriageway between the main entrance/exit Tower View and either the A20 or M20 which is where the majority of traffic travels to and from, there are quite often significant difficulties in residents trying to leave Kings Hill in the mornings. The single carriageway A228 south towards Mereworth and Tonbridge and beyond is heavily used but often backs up. The traffic frequently blocks the exit out of Kings Hill, giving rise to prolonged traffic queues and all the cumulative wasted time as people seek to leave Kings Hill on a daily basis for employment off Kings Hill, or pursuit of leisure activities. We attach photos for the mornings of 12th September 2018, 18th October 2018, 19th December 2018 and 6th March 2019. Such is the issue the Parish Council have for some time been seeking amelioration arrangements through contact with our county councillor and KCC highways. These issues currently exist and were highlighted to us by residents at our recent public meeting as well as being referred to in some of their objections; phase 3 is already expected to add to the problems and we raise concerns over any further development eventually leading to further gridlock.

1.1.3 Paragraph 109 of the National Planning Policy Framework 2018 states

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road networks would be severe”.

1.1.4 It is felt, and the attached pictures show, that the cumulative impact of more houses will have a severe impact on the surrounding road network. The existing number of houses already creates gridlock. This is a material planning consideration that will create major highway issues due to increased traffic

generation and vehicular access. Kings Hill Parish Council and Mereworth Parish Council have employed a consultant to undertake a highway appraisal in respect of the local plan. The comments within the report are pertinent to this application in respect of any further housing numbers and their effect on the road network. [DPHEH: the full report is not appended to this annex]

- The Local Plan's assessment fails to recognise that the width of A228 Malling Road in the vicinity of its junction with Kent Street is unable to cope with the existing traffic flows on the route and the additional traffic that will be generated by the proposals for additional housing will exacerbate congestion and poor highway safety
- There is no feasible or realistic solution to widen or improve A228 Malling Road to accommodate the additional traffic that will be generated.
- The significant impact from the proposed developments in terms of capacity and congestion and highway safety cannot be cost effectively mitigated to an acceptable degree.
- The proposals have therefore been prepared by a strategy. The proposals have therefore been prepared by a strategy that fails to meet the infrastructure requirements and cannot therefore satisfy the National Planning Policy Framework (NPPF) requirement for soundness, as required by the Ministry of Housing, Communities and Local Government. The NPPF states that "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed", there appears to be minimal if any mitigation for transport. We note the proposal to provide further traffic lights to the Tower View/Ashton Road roundabout, however these are shown as being installed on the Tower View exit arm. Rather than assisting residents leaving Kings Hill, this is likely to further restrict egress. What is required instead is a means of leaving the exit clear so that exit off of Kings Hill is as unhindered as possible
- Similar queuing occurs at the Tower View/Kings Hill Avenue roundabout in the mornings where the incoming business traffic has priority. There are often a number of cars queuing on the Tower View arm heading north to exit Kings Hill and on the exit arm of the new unnamed road through phase 3, similarly queuing to exit Kings Hill. Phase three has yet to be built out and occupied and hence this situation can only get worse, without calculating the additional effect of these latest proposals. The parish council feel there already a need for traffic light signalling to balance priorities and improve traffic flow in and out of Kings Hill.

1.1.5 We note from the traffic assessment that it is deemed from data collection and software modelling that there will be minimal queuing as a result of this new application. This appears incongruous with residents current experience and

we raise concerns that there appear to be little, if any proposals for mitigation. The parish council is aware that this roundabout is to be the subject of a traffic assessment review during the build out of phase three, but already raises concerns that this may conclude a similar result that no mitigation is required, despite residents existing concerns and issues.

- 1.1.6 Residents have raised concerns regarding the fact that there is no pedestrian crossing on Kings Hill Avenue. If TMBC are minded to allow residential use then a suitable pedestrian crossing should be provided for safety of school pupils and pedestrians who need to access the school site and the centre of Kings Hill
- 1.1.7 One of the greatest concerns is the lack of accessibility of GP doctor appointments. Kings Hill parish council have been working with the West Malling Group Practise to try to improve accessibility and availability for residents, following concerns raised. The situation is already considered to be seriously oversubscribed; indeed the practise is no longer accepting direct applications for new patients. As stated above, this situation is already occurring, before the 635 homes from phase three are built and occupied. The documents highlight that there are only 10 FTE GP's for the 20,616 residents registered with West Malling Group Practice, although West Malling Group Practice have informed us that the current number is actually 6 FTE. It states Wateringbury have 11 doctors for 7,716 people and 9 doctors at Thornhill Medical practise for 14,113 patients. Despite such limited provision already for the residents of Kings Hill, the documents suggest there will only be a moderate adverse impact on the medical service and make no clear offer of mitigation. The West Kent Clinical Commissioning Group have stated the mitigation required which the parish council wholeheartedly support, if TMBC are minded to grant consent. The parish council are keen to see the majority of this contribution being for the West Malling Group Practice to improve the current poor ratio and also allow residents from the new areas to register and therefore have a doctors surgery within walking distance.
- 1.1.8 Paragraph 8(b) of the National Planning Policy Framework 2018 refers to “to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support health, social and cultural wellbeing”
- 1.1.9 This application is not socially sustainable for the low number of doctors per resident as detailed above. This is before the number of houses proposed for the local plan and this application.
- 1.1.10 The parish council and residents alike are concerned over the impact on the local infrastructure. Kings Hill has been designed to be attractive to young families and has proved very successful and popular in this respect. However,

although there is reference to pre-school provision within the documents, the parish council is aware of the severe over subscription of pre-schools and the pre-school attached to the community centre is full and has a waiting list of 95 for 2019. The parish council seeks a contribution be provided for pre-school, if TMBC are minded to grant consent.

1.1.11 Although there is a large number of secondary schools within an hour's travel radius of Kings Hill most are oversubscribed and all require bus or private travel. The implication of this is increased traffic movements and expensive travel costs. This is a deficiency in a social facility and a contribution should be made towards a new local secondary school which would allow for sustainable travel and to meet the future needs of ongoing developments.

1.1.12 This site is accessed off a private commercial road which is closed at least once a year but could be more often. Even if only closed once a year (typically Christmas Day), this does leave residents unable to leave Kings Hill on a day when there is no public transport. The effect is that these residents need to forward plan and park their vehicle elsewhere, if they are not to be prevented from travelling on a typical family celebration day and national bank holiday. Due to the extent of private roads, not only would this mean residents having to park some impractical distance away from their home to safeguard their accessibility and freedom, the impact on other areas would be significant and displace other residents. The cumulative effect is likely to be significant harm to highway safety, which is the test in Paragraph 109 of the National Planning Policy Framework 2018.

1.1.13 There is reference within the submission that the emerging local plan should be disregarded on the basis it is not yet adopted. However, the creation and submission of the local plan has engaged with the local population who have been able to comment and provide their views with a view to shaping the plan for the future. Whilst the plan is now for review with the allocated planning inspectors, it is deemed to be a material planning consideration now as it is a proposal for how the future should be shaped; to pay no regard at this interim stage would be contrary to the intentions of the local plan.

1.1.14 The parish council remains concerned that the applicant's advisers suggest expired consents for the previously consented business uses should be a material consideration. Kings Hill is significantly more developed than it was at the time such consents were granted and it is requested that the conditions of today afford greater weight than expired consents of the past.

1.1.15 There are several references to sustainable transport and good links to public transport however this site is considerable walking distance from the railway station. Whilst there are some frequent bus services this does not typically apply off peak or evenings and weekends when there are considerably less or no services. The implication of this is that car ownership is virtually essential for

residents of Kings Hill which gives rise to increased car travel and need for sufficient parking.

1.1.16 The documents advise that parking provision in developments over the last ten years has typically been underprovided, which is clearly evident when looking at any of the areas of phase two at evenings and weekend when most of the roads are full of parked cars along one or both sides, including inconsiderate and often dangerous parking. However, the parking provision proposed in this application is based on providing at or just above the level of minimum parking required, based on the Kent Design Guide IGN3. This publication is dated 2006 and hence is the very document that has led to under provision over the last ten years.

1.1.17 The parish council has challenged the travel plan for phase 3 due to the stated low numbers of traffic movement and low threshold of improvement target. We are concerned this low bench mark is not applied to this current application

1.2 West Malling PC: No objection but would like to see some assessment of the impact from the additional housing on the road network and other infrastructure.

1.3 KCC (H&T):

Initial comments provided on 01 March 2019; seeking further information and clarification

Further representations received on 07 May 2019 as follows:

**Access:**

1.3.1 The masterplan which is included on the TMBC website shows a single access serving two areas of development which are separated by landscaping. There is no looped arrangement from the main access and the emergency access serves only the southern part of the development. Kent Design requires that developments of between 50 to 300 dwellings have two points of access or a loop with a short connection to a single point of access and a secondary emergency access link. The comments provided in the Technical Note do not address this issue.

**Committed Development**

1.3.2 The draft TMBC Local Plan has been submitted, therefore the allocations are a material consideration to be included in the assessment.

### Trip Rates

1.3.3 The trip rates used in the assessment for the residential use are based on old data. Please provide details of the when the surveys were completed and what areas they covered. This should be cross checked against TRICs. This is also the case for non-car trips. Secondary school trips – para 6.3.3 of the TA suggests that 50% of the secondary education trips would be travelling to Maidstone and 25% to Tonbridge and Tonbridge Wells – please clarify where the remaining 25% would be travelling to?

### Traffic Generation

1.3.4 The Transport Assessment states that Sites 5.1, 5.2/5.3 and 5.6 have lapsed permissions for employment which have previously funded highway improvements. The employment trips have therefore been discounted from the proposed residential trips in the Transport Assessment. Advice was sought from TMBC on the status of the sites in order to check whether this methodology is appropriate. Advice received stated: “having undertaken a detailed assessment of our planning history records the baseline position adopted for the purposes of the TA is correct and I will be asking Kent Highways to proceed to providing their further detailed comments accordingly. In providing this confirmation, I must make clear that this only confirms the Council’s agreement to the status of the relevant planning permissions at this time in connection with these sites and should not be construed as any position having been reached on the proposed loss of allocated employment sites. That matter continues to be assessed in detail.” The TA indicates that the employment uses on sites 5.1,5.2/5.3 and 5.6 was in the order of 15,000 sq. ft per acre and a trip rates has been derived per sq.m. using phase 2 trip rates for the employment use. The use of the maximum employment density is questioned, and evidence is required. The methodology for the calculation of the employment trips per m2 is also required. The results below show the traffic generation for the different uses and the residual trips:

	AM Peak			PM Peak		
	In	Out	Total	In	Out	Total
Residential	88	186	274	174	100	274
Employment	434	23	457	53	326	379
Residual	-346	+163	-183	+121	-226	-105

1.3.5 The use of the land for residential purposes reduces the overall number of vehicle trips when compared to the employment use, however there is a significant increase in vehicles leaving Kings Hill during the morning peak and arrivals during the evening peak hour.

## **Impact**

1.3.6 The arrival and departure profile will change significantly for the different use of the sites and the effect of this, including the Local Plan development allocations, should be shown in a capacity assessment. The recent Visum modelling and Forecast Junction Capacity Assessments which were prepared as evidence for the Local Plan includes for 24,217m<sup>2</sup> of previously permitted unbuilt development at Kings Hill; please clarify whether the current applications form part of this land or a larger unbuilt employment parcel. Capacity assessment have been completed for key junctions for 2018, 2028 and 2031 peak hours to compare the commercial development impact with residential development impact along the local highway network.

### **Tower View/Kings Hill Avenue**

1.3.7 The Transport Assessment indicates that the Kings Hill phase 3 development is required to monitor and mitigate this junction. This being the case any permission for the current application sites should include a condition for no occupation until the works have been completed and the mitigating measures will be required to accommodate the traffic generated by the current applications. An improvement scheme which also allows for the increased traffic arising from the development of the Broadwater Farm site will be required and appropriate contributions will be sought through the Infrastructure Delivery Plan.

### **Tower View/A228 Ashton Way**

1.3.8 The junction is over capacity in the PM peak. The Kings Hill phase 3 development is required to improve this junction. This being the case any permission for the current application sites should include a condition for no occupation until the works have been completed. The mitigation measures should be sufficient to accommodate the additional traffic generated by the current application and the Local Plan Development Allocations. It may be appropriate for proportionate contributions to be pooled from the development parcels through the Infrastructure Delivery Plan.

### **King Hill/A228/Malling Road – Blaise Farm**

1.3.9 A small adjustment to the flare length on Malling Road approach is proposed. The request to extend this flare length was made as the flare length proposed allows for 2 lanes of queueing for a distance of 21m which will accommodate approximately 7 pcu's. The Arcady assessment indicates that the mean maximum queue lengths predicted on A228 south are 23 pcu's in the AM peak and 29 in the PM peak. Clearly this queue will extend well beyond the flare proposed and consideration of further widening is recommended.

### **Malling Road/Gibson Drive**

- 1.3.10 The junction has been identified for improvements in the Local Plan TA. An assessment of the junction with the proposed improvement and the proportionate contribution is required towards the improvements.

### **M20 Junction 4**

- 1.3.11 The impact of the proposals at M20 Junction 4 has not been assessed.

### **Crashes**

- 1.3.12 The crash plot indicates that there have been a significant number of crashes at both the A228/Tower View roundabout and the Tower View/ Kings Hill Avenue roundabouts, but the period of time is not specified. Additionally, Blaise Farm roundabout is not included. The details of the crashes should be examined in order to identify whether there are any particular patterns which would be exacerbated by the additional trips generated by the current applications.

### **Conclusion**

- 1.3.13 Additional information is required as identified above. Without this information I am not currently satisfied that safe and satisfactory access can be achieved or that the cumulative residual impact of the development will not be prejudicial to the submitted draft Tonbridge & Malling Local Plan. I would therefore wish to raise a holding objection until such time as the concerns and issues raised have been adequately addressed.

### **1.4 HE:**

Initial comments provided on 14 February 2019, seeking further time to comment

#### **Further comments provided on 05 March 2019 as follows:**

- 1.4.1 Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
- 1.4.2 Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M20 (and particularly in the vicinity of Junction 4).



- 1.4.3 Highways England responded on 14 February 2019, indicating that we need more time to review the Transport Assessment (TA) and Transport Statement (TS) which had only just been uploaded to the planning portal. We have since received additional correspondence on the 01 March 2019 indicating that the TA appendices had now been uploaded – these documents have not been reviewed at this time and further communication relating to this new information will be provided in due course.
- 1.4.4 By way of background, Highways England has been liaising with Tonbridge and Malling Borough Council and Kent County Council over the traffic impacts of the Regulation 19 Local Plan on the SRN, which covers the M20 Junctions 3 to 5, M26 Junction 2a and the A21 at Tonbridge. This has involved the consideration of the traffic modelling that underpins the transport assessment work to be found within the evidence base and which included the M20 Junction 4 Revised Capacity Assessment Report (October 2018). We are generally content that the Local Plan transport impacts to 2031 can be accommodated on the SRN along the M20 and A21 without the need for any physical improvements to the associated junctions including merges and diverges.
- 1.4.5 In this context, having now considered the application in the context of the TA and TS (without appendices) it is apparent that the proposed development covered by these applications fall outside of the recent Local Plan Regulation 19 consultation and therefore are unlikely to have been included in the modelling assessment of 2031 impacts. Further evidence is required to justify the proposed offset of existing use status.
- 1.4.6 In summary we have the following comments regarding the TA and TS associated with these developments:
- 1.4.7 The TA section 3.2 does not directly relate the site boundaries to the sites to Phase 2 committed development i.e. the direct comparison of the sites and their relevance to Phase 2 (TM/02/03429) is not evidenced.
- 1.4.8 The TA section 6.1 and table 6.1 and TS section 7.1 indicate that the trip rates are “*derived from the Phase 3 TA*”. This reference should be clarified however, it appears that these rates refer to planning application 13/01535 King Hill Phase 3. The associated Kings Hill Phase 3 TA states that trip generation ..... “*has been agreed through the scoping exercise that trip generation rates by mode of travel will be based upon those rates that were previously agreed through the 2002 SoCG*” and were agreed with HA. A sensitivity test is required using TRICS to demonstrate that these rates are still appropriate.
- 1.4.9 The TA section 6.2 ‘offset’ section does not clarify what of Phase 2’s 92,900 m<sup>2</sup> of commercial and 750 houses has been built out / is available for use. Section 6.2.1 states that “*The commercial land parcels of Phase 2 that are the subject of this new residential planning application have not been built out, and it is*

*noted that the planning permissions for unimplemented Phase 2 plots has recently elapsed*".

- 1.4.10 The justification for offsetting the residential element of the development with the commercial is not evidenced – the status of the consent associated with TM/02/03429 appears uncertain in terms of if all consents were actually exercised before elapsing. Furthermore the traffic baseline has changed since 2002 and since the infrastructure at the M20 J4 was built in 2006/2007 which was presumably for the purpose of accommodating the Phase 2 development as it was intended at the time. It is not clear how much of the commercial / residential elements were built out as part of the Phase 2 permission and any future amendments to the application – this needs to be further clarified.
- 1.4.11 The TA section 6.2.2 states “The Planning permission for Phase 2 allowed for a maximum commercial development density on any one plot at a rate of *15,000 sq ft per acre.*” – a TA from the TM/02/03429 planning application does not appear to be on line and has not been directly evidenced within the TA associated with these developments.
- 1.4.12 The TA section 6.2.3 and table 6.3 indicates that the “*table below sets out the trip rates and the proposed trip generation for the phase 2 commercial units on the following sites within this proposed development*” as above this is not referenced as to how the site descriptions and sizes associated with these developments, relate to the 2002 application trip rates and calculations indicated in the tables.
- 1.4.13 The TA table 6.2.4 and table 6.4 summarises how sites 5.1, 5.2, 5.3 and 5.6 are offset by commercial, however does not account for site 5.4 which has no planning history. Similarly the cumulative impact of all sites including 5.5 in the TS should be considered.
- 1.4.14 The TA section 6.2.5 acknowledges that a tidal flow direction from the change in development type. However the ability of the forward funded M20 J4 to accommodate a tidal change in flow and any associated change in trip distribution is not considered.
- 1.4.15 There is no overall acknowledgement of the cumulative impact of vehicles associated with all of these developments at the M20 Junction 4 – the TA section 6.3 and section 7 “impact assessments” or the TS section 7 and 8 do not consider trip distribution as far as the SRN. Trip generation as far as the M20 J4 should be included in the spreadsheet model referenced in the TA section 6.3.4 (to be provided).
- 1.4.16 In summary the traffic associated with these developments at the M20 Junction 4 is not clarified. We are concerned that the additional (and redistributed) traffic generated by the sites in combination could result in capacity issues in 2031. This impact has not been assessed and we are

currently unable to determine if the proposal would result in a 'severe' impact on the SRN and therefore will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 109).

- 1.4.17 We will provide a formal recommendation when we have assessed the modelling work and can therefore be confident that the application is in its final form. In the meantime, we would ask that the authority does not determine the application (other than a refusal), ahead of us providing a further update. In the event that the authority wishes to permit the application before this point, we would ask the authority to inform us so that we can provide substantive response based on the position at that known time.

Final comments provided 15 May 2019 as follows:

- 1.5 Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the M20 (and particularly in the vicinity of Junction 4).

Highways England responded initially on 14 February 2019, indicating that we need more time to review the Transport Assessment (TA) and Transport Statement (TS) which had only just been uploaded to the planning portal. We have since received additional correspondence on the 01 March 2019 indicating that the TA appendices had been uploaded. We responded most recently on 05 March 2019 (see attached e-mail) which reviewed the Transport Assessment (TA) dated November 2018 that indicating that further information and evidence was required. An updated PBA Technical Note (TN) dated 8 April 2019 directly responded to the 05 March Highways England comments has been received. We have now reviewed this TN and have the following comments.

It is notable that a number of issues raised in our 05 March response have not been directly addressed and information requested has not all been provided to our satisfaction. Therefore Highways England has undertaken its own analysis on the cumulative impacts of these developments on the M20 Junction 4. Accordingly, we have now satisfied ourselves that the level of impact likely to result from the proposals, as outlined in the TN (i.e. 107 AM peak hour trips and 89 PM peak hour trips) can be accommodated on the SRN without resulting in a 'severe' impact on the SRN and therefore will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT

C2/13 para's 9 & 10 and DCLG NPPF para 109). Therefore we do not offer any objections or requirements relating to the proposals and I attach our HEPR form to this effect.

However, it should be clarified that, once these and other recent developments that have been assessed and approved in the vicinity have been constructed and occupied, then the available spare capacity at the M20 Junction 4 is likely to be minimal and accordingly further additional trips are likely to severely affect the safety, reliability and / or operation of the junction to the extent that substantial mitigation will be required. It is therefore unlikely that Highways England will accept any further development that will impact M20 Junction 4 without accompanying improvements to the junction

- 1.6 KCC (PROW): Public footpath runs through the site and should be accommodated in situ as part of the master plan.
- 1.7 BHS: Requests that in the event planning permission is granted, the footpath be upgraded to a bridleway.
- 1.8 EA: No objections but planning conditions recommended if permission to be granted.
- 1.9 KCC (LLFA):
  - 1.9.1 We are aware from the Environmental Statement (GVA Grimley Ltd, December 2018) that deep bore soakaways are proposed on site. Since ground conditions (Hythe Bed Formation) are generally acceptable for deep bore soakaways in the Kings Hill area and a primary drainage solution for most developments here, in principle we are satisfied with the drainage proposal. However, as part of a detailed surface water drainage scheme, we would recommend that additional ground investigation will be required to support the use of infiltration. It is recommended that soakage tests and falling head tests be compliant with BS5930, notably the requirement to fill the test pit several times. Detailed design should utilise a modified infiltrate rate and demonstrate that any soakaway will have an appropriate half drain time. We would recommend that results sheets are provided and a location plan of infiltration testing.
  - 1.9.2 The final infiltration zone selected for the deep bored soakaways will need to balance the need to reach permeable strata with maintaining sufficient unsaturated zone. The Environment Agency would typically promote a minimum 10m unsaturated zone above the highest recorded groundwater level at the site.
  - 1.9.3 Should your local authority be minded to grant permission for this development, we would recommend planning conditions be imposed.

1.10 SWS: Our initial investigations indicate that Southern Water can provide foul sewage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer. We request that should this application receive planning approval, an informative be attached explaining this process.

1.11 KCC (Heritage): Planning condition requested securing archaeological watching brief in the event that planning permission is granted.

1.12 NE: No objection

1.13 Historic England: No comments to make

1.14 KFRS: Means of access is considered satisfactory

1.15 Kent Police: General comments provided in respect of crime prevention through environmental design.

1.16 CCG: Contributions sought as follows:

- £180,648 towards refurbishment, reconfiguration or extension at West Malling Group Practice and/or Wateringbury Surgery or towards new general practice premises

1.17 KCC (Economic Development): Contributions sought as follows:

- Primary Education - £43,092 (towards Valley Invicta Primary School)
- Secondary Education - £39,102 (towards Phase 2 Judd School expansion)
- Community Learning - £2,279.86 (Commissioning of community learning classes, arts and culture events at Kings Hill)
- Youth - £942.91 (towards providing sports and IT equipment and storage for KCC commissioned youth services at Kings Hill)
- Libraries - £12,281.39 (Towards community outreach library services at Kings Hill)
- Social Care - £3,913.00 (Towards providing new or adopted facilities for those with physical or learning disabilities at Kings Hill or West Malling and for the installation of assistive technology in housing units within the development)

1.18 Private Reps: 1 + site + press notice/0R/24X/0S. Objections raised on the following grounds:

- Impact on infrastructure and local services;

- Pollution and congestion impacts;
- Lack of adequate train services already;
- Erosion of green spaces;
- Roads already at capacity;
- Business park, not a residential area;
- Inadequate parking provision;
- Harm to ecology and biodiversity;
- Lack of landscaping, serious overdevelopment of land;
- Lack of community involvement in proposals;
- Scale of surrounding buildings would dwarf a residential development;
- Should remain for commercial space as originally planned;
- Need for employment land and premature given stage of local plan making;
- Exceeds the extent and scale of the potential hotel site on Liberty's master plan;
- Will narrow the gap between Kings Hill and West Malling