

Appendix 1

East Malling and Larkfield PC Comments

03.06.24

1. The Parish Council has noted the revised site layout plans which are for illustrative purposes only in respect of this outline application.

2. The neighbour at 161, points out the revised plan is not up-to-date as it does not show the extra land he purchased to the south of the property. This area of land should not therefore form part of the application and as we understand it no notice of this application has been served on the owners of 161.

3. The above point is crucial if the applicant's proposed road access affects that land including any site lines.

4. We are also concerned the difference in land levels should be fully recognised. This is particularly an issue for the Parish Council given the experience at Forty Acres site where this was not apparently appreciated when the developer submitted and the KCC as Highway Authority accepted plans for the access onto the A20.

5. We also note the Transport Assessment submitted with the Gladman application for 150 homes south of Clare Lane, East Malling, KCC say "even a modest increase in traffic volumes (on High Street and Mill Street) has the potential to significantly impact upon overall levels of highway safety". (Our underlining). This site is of course directly creating traffic to go north along the constricted High Street and Chapel Street.

6. The Parish Council is aware from residents there are badgers both within and around the site. It is not clear how their habitat is to be protected.

7. The Council also wish to take the opportunity to re-stress it considers this application is detrimental to the village Conservation Area and its Heritage Assets. East Malling is an historic village based on the stream running north from Gilletts Pond. The "dig" currently unearthing more Roman foundations just north of the railway station on Parish Council owned land points to the age of the settlement based on the stream. This application, if approved, would affect the rural setting and it is considered should be refused on this basis.

Comments 17.03.23

As a further comment we would ask in considering this application the correct location and effect of the entrance road is considered.

This should not involve the extended garden of 51, Wateringbury Road as shown on the site plan.

It should also be clear the access road and its site lines would involve the removal of some of the trees along the boundary with Wateringbury Road.

Comments 01.11.22

In June this year East Malling and Larkfield Parish Council commissioned traffic surveys on Wateringbury Road, Chapel Street and High Street East Malling. Please find attached 3 reports setting out the traffic data collected during the period 21st – 27th June 2022.

The 3 sites are identified:

1. TW200622-01 114 Wateringbury Road i.e. Wateringbury Road north of Huntley Cottage and the road narrowing feature
2. TW200622-02 43 Chapel Street i.e. outside Manningham House
3. TW200622-03 42 High Street

We are not traffic experts but we have carried out some analysis of the data. For the period Monday – Friday the volume of southbound traffic on Chapel Street and Wateringbury Road exceeds northbound traffic by around 1400-1500 movements per week. Conversely, on High Street northbound traffic exceeds southbound traffic by about 1000 movements per week. No doubt this is a reflection of the number of vehicles joining from The Rocks Road and might imply that local residents tend to head northwards towards the A20 and that the greater volume of southbound traffic on Chapel Street and Wateringbury Road is a result of wider 'through traffic'. In turn, that would imply that the majority of traffic exiting the development will head through the narrow and congested Chapel Street and High Street, adding to existing problems.

We calculate that there are up to around 600 combined traffic movements in High Street for each hour between 7am and 9am and up to 575 for each hour between 2pm and 7pm (bearing in mind that traffic begins to build on this route for the school

run before 3pm). That is a considerable volume of vehicles passing along this constrained route, negotiating narrow sections of road and parked vehicles, resulting in congestion and, we believe, air quality issues. We are very concerned about the further pressures that will be placed on this route as a result of this development. Despite the applicant's assertions, the site is not within a suitable walking distance of local shops and schools and we feel residents will be highly reliant on cars to get about particularly as the pavements in Chapel Street and High Street are very narrow and often blocked by parked vehicles or vehicles mounting the pavement to create space for larger vehicles to pass in the narrowest sections.

In terms of speed, some drivers are reaching significantly high speeds at all three sites. We observe that at site 2 (Manningham House) some 79% of vehicles overall are exceeding the 20mph limit including 87% of southbound traffic i.e. traffic that is heading towards the speed table and some 238 vehicles heading north through site 1 (north of Huntley Cottage) are travelling over 50 mph i.e. heading northwards towards the speed table - that is, there are issues with vehicle speed on both approaches to the proposed site entrance. This should be taken into account when consider sight lines.

Comments 05.09.22

1. These comments are to supplement those previously lodged and particularly regarding heritage and landscape issues.

2. The site is close to the East Malling Conservation area which was first designated by Kent County Council on the 16th April 1971 and extended on 13th May 1975. The initial area covered that part of the original village north of the railway with the area around the crossroads with the village green, king and Queen public house, and Church Walk leading up to St James Church. And the area extended southwards up to the railway covering the ascending high Street with its several listed buildings.

The 1975 extension was to include the west side of Chapel street up to listed Ivy house farm with its splendid barn and the old village school now Manningham House. And then a further extension was made to include Rocks Road. Once just called "The Rocks" this took in Paris House with its walled garden and Rocks Farmhouse with the ragstone walls typical of east Malling.

3. East Malling has many listed buildings showing it is an ancient village based on the stream that emerges in Gilletts hole, Gilletts Lane which runs down the side of Rocks Road through the back gardens of the houses to the east of the High street emerging at a "dip hole" in Church Walk before going through the garden of Court lodge on its way to Bradbourne House lake. For the record the listed buildings nearest to this proposed site are:

122 Wateringbury Road (not Chapel street as per Huck Group) this is on west side of the road as one approaches the site from the south.

14 and 16 Chapel Street.

The Limes and the wall to the north east.

Ivy house farm and its barn. This described as “one of the finest farmhouses in Kent” by Arthur Mee in his Kent book published in October 1949 (impression)

Tamarisk cottage

Kinross cottage.

4. Locally Important buildings.

The Parish Council consider that the two oasts with complete roundels and cowls being part of Ivy house Farm and with that building have important group value as part of the traditional hop farms once found across Kent. Indeed it is noted the copy old maps going back to the tithe map of 1839 show the hop fields that previously existed around East Malling including this site And of course fruit. And also the buildings now known as Manning house, once the village school, dated back to 1849.

5. It is the Parish Council's view that developing this site would have a harmful effect on the designated Conservation Area as it would change the approach to the village from the south from a rural countryside one to a more urban one out of keeping with this historic street scene marked by the village entry of Ivy House Farm complex.

6. This entrance is virtually unchanged going back to the Tithe map and beyond. At present there is a clear sense of moving from the countryside into the historic village with its narrow Chapel Street. It is appreciated the development would be landscaped and set back but it would still be a change with a new entry access road no doubt with site lines and street lights within the new housing layout.

7. Section 106 Agreements. The applicants list is noted but should this development be approved there is no play area within the site and we feel it would be inappropriate to have one though we ask there would be an agreement to secure the community orchard and the open space including future maintenance. There is the parish councils playing fields close to the King and Queen and there is a need for outside gym equipment there.

Comments 22.08.22

Further to point 5 of our interim comments relating to public path MR107 a copy, as an example of walks using this path, issued by the Borough Council in 1993, is attached.

It is noted the walk also mentions the former school, now Manningham House, which the Parish Council considers to be a locally important building dating back to 1849. Also the Oasts as shown with Listed Ivy House as a group.

Comments 18.08.22

1. The Parish Council wishes to make these interim comments members having read the various responses so far and the documents submitted.
2. It is aware the local members have asked this matter to be reported to the area committee which it supports. However, it is also of the view that looking at pages 126 and 127 of the borough constitution that the application should be reported to the committee as it is a departure from the adopted plans and policies forming part of the statutory Development Plan and none of the exemptions apply.
3. The Parish Council considers the starting point continues to be the existing adopted plan, namely the local plan of 2007 and in particular but not solely policy CP 24. It recognizes given the fact the borough apparently does not have a 5 year residential land supply and the Local Plan is not up-to-date the so called "tilted balance" needs to be applied.
4. It is considered that the plan submitted is clearly on land forming part of the countryside and there are landscape effects as well as most importantly on the East Malling Conservation area plus the nearby listed and heritage buildings. A detailed statement of the Council's case will follow.
5. It is also concerned that there will be an effect on the enjoyment of the users of public footpath MR 107 from rocks Road to sweets Lane as instead of having completely countryside views they will have a view of a housing estate to the west .This path appears on many local guides including some issued in the past by the Borough Council.
6. It is noted that Environmental Health are asking for an Air Quality Assessment and the Parish Council supports that request.
7. The Parish Council has also noted that the CPRE request the application be withdrawn until all the ecological reports are available and that clearly needs a response. If permission were given subject to a condition they be produced later it is questioned if this would in practice be effective.

8. For the record as others have stated there appear to be badgers on and around the site.

9. There is a lot of concern about the highway impacts of the development given the restricted nature of the roads to the south where we think it is accepted traffic generated from the site is likely to go to gain access to the A20 at New road junction and the M20 beyond as well as the supermarkets and other facilities at Larkfield. But the route through down via Chapel Street and High Street with it height restricted railway bridge plus parked cars with narrow or no pavements in part is we feel not suitable to accommodate further traffic. At peak times there is often local gridlock and we cannot see any practical way to improve matters. The Highway authority needs to assess this problem. It is of course due to this situation there is a 20mph limit and lorry restriction applying.

10. Lastly, we question how sustainable this site is given that whilst there is East Malling station it only has trains stopping hourly; there is no bus service save the 58 whose future is in doubt; and there are no shops in the village. In reality if permission is given then the house occupiers are likely to be car based.