

EAST PECKHAM PARISH COUNCIL

Clerk to the Council, Mrs. K Bell
East Peckham Jubilee Hall, Pippin Road, East Peckham, Tonbridge, Kent, TN12 5BT
Telephone: 01622 871309, Web: www.eastpeckham-pc.gov.uk,
Email: admin@eastpeckham-pc.gov.uk, Twitter @EastPeckhamPC

Local Plan Team
TMBC
Gibson Building
Gibson Drive
Kings Hill
West Malling
Kent
ME19 4LZ

22 November 2016

Dear Sirs

TONBRIDGE AND MALLING BOROUGH COUNCIL LOCAL PLAN: THE WAY FORWARD

I write regarding the above.

Having considered the consultation documentation, the Parish Council would like to comment, in this respect; please find attached the following documents:

1. Completed Questionnaire
2. Supplementary submission

The Parish Council would like to express disappointment that TMBC did not choose to host a formal exhibition on the Local Plan and how it is might impact upon residents in East Peckham. I would therefore like to extend an invitation for a representative from TMBC to attend the East Peckham Annual Parish Meeting on 03 April 2017 when an update can be presented to members of the East Peckham community. We would also like to express our frustration with some of the wording of the consultation documentation; we felt it was vague, contradictory and confusing in places.

I trust that the views of East Peckham Parish Council will be taken into account as the Local Plan progresses.

Yours faithfully

Karen Bell
Clerk to the Council

East Peckham Parish Council Submission

East Peckham Parish Council Response to Tonbridge and Malling Borough Councils, 'Way Forward' Local Plan Consultation

Introduction

East Peckham Parish Council has correlated our view for the future of East Peckham with the Tonbridge and Malling Local Plan where possible. We find many areas of commonality, which we welcome, but we are vigorously opposed to any proposed large scale developments and encroachment onto the Green Belt which seems to go against many of the tenets of Tonbridge and Malling Borough Council as well as our own. EPPC's response to the key questions contained within the questionnaire is as follows:

Q1	Key objectives	AGREED
Q2	Building Blocks	AGREED
Q3	Principles to guide development strategy for the new local plan	DISAGREE
Q4	What could a sustainable development strategy look like	DON'T KNOW
Q5-7	How should the new local plan respond to economic evidence	AGREED
Q8-0	What should be the future role of Tonbridge Town Centre	N/A TMBC should Engage with Tonbridge residents
Q11-12	Should green belt boundaries be in the local plan	AGREED
Q13	Issues in order of importance to EPPC	
	1 Controlling housing densities	
	2 Stipulating car parking standards	
	3 Applying water efficiency standards	
	4 Providing affordable housing	
	5 Achieving greater accessibility standards	
	6 Providing publicly accessible open space	
	7 Applying internal space standards	
Q14-15	Local Plan responding to the optional national standards	AGREED

Supplementary comments

- EPPC agrees to the key objectives of the Local Plan but not at the expense of other factors – chiefly the quality of life for current residents. Focus should be on creating jobs and growth in the areas that need support.
- Small business run from home is a growing trend in villages but this will be reliant on the environment remaining a pleasant place to live, not becoming a long-term building site whilst it is turned into a small “new town” with clogged access.
- Rural tourism and agriculture contribute to the local economy and should not be forgotten; in fact they should be actively encouraged.
- Development in rural parts of the region will tend to pull away focus from the areas that need regeneration. Significant new developments in rural areas would be best left unchanged from current policy.
- Development on Grade 1 & 2 agricultural land would be a very short sighted policy, given the decreasing proportion of home-produced food consumed in the UK.

- Finding those right locations will always be a challenge. Correctly assessing the numbers required will only ever be guesswork. We agree that it is Tonbridge and Malling Borough Councils urgent duty to properly plan for new homes in the coming years and to put an end, as soon as possible, to the free-for-all applications we are currently suffering.
- Huge, overbearing houses can change the character of the community when the community of East Peckham would probably be best served with a mixture of starter homes for young people and suitable properties for downsizers.
- In rural areas there is dire need for a mix of housing, including affordable. There needs to be an appropriate number of homes for our community's size and requirements, and would be for local people, to the benefit of our community.
- The siting of homes should not be about the financials to suit land owners or Tonbridge and Malling Borough Council. The houses need to be built where they are needed – the areas targeted for growth – not simply for yet more commuters.
- The prevalence of dormitory village mentality is already eating away at the rural way of life in the region resulting in a very noticeable reduction of participation in local events and activities. It was the community spirit that made our villages and towns “a nice place to work and live” in the past and further erosion of the community spirit by inappropriate development is not welcome.
- Affordable housing in the ‘richer’ areas and rural villages should be more of a priority. As stated above, the focus should be on affordable housing for the benefit of East Peckham as a whole, not for the benefit of developers or for generating rates revenue.
- The developer may well promise lots of services to mitigate a large development. However, the costs of infrastructure and bringing in services required (i.e. widening lanes and new road links, schooling, doctor etc.) will make that an expensive development, resulting in mainly mid- to high- end housing, not the lower cost housing the area might need.
- We know people in the district who are already dissatisfied with the existing infrastructure, whether it is the responsibility of TMBC, KCC or EPPC. There is little confidence that any new mass housing will have suitable infrastructure in place. With the uncertainty over the number of houses needed, we see a great danger in a site being identified for a large-scale development, then the site only being slowly developed over a long drawn out period, making the area an eyesore but, worse than that, with the promised infrastructure never actually materialising.
- Only develop in areas with suitable infrastructure. Concentrate more to provide upgrades where there has been a lack of investment. Do not just consider action because there may be some new housing planned, but instead consider the infrastructure shortcomings for the benefit of the existing population.

- Currently, the infrastructure is not in place to service huge new developments. The local schools would not be able to cope, and neither would the surgeries. Given that there is existing uncertainty over the future of the Branch Surgery in East Peckham it is doubtful that the 'Super-size' surgery in Paddock Wood would be able to cope. However, there are huge problems with GP recruiting already, so these would be difficult or impossible to staff. In addition, the Super-Sized surgery in Paddock Wood is situated some distance from most people - the lack of public transport would mean that patients would need to drive or somehow find transport.
- There is no railway station, bus services are poor, and there are already concerns about large traffic volume on the East Peckham by Pass where there are already severe traffic delays, and not only in rush hour.
- The area proposed has an extremely high water table, there is flooding with regularity. It is not therefore suitable for building. Green areas help to mitigate the effects of climate change and help to reduce the risks of flooding. The suggestion of building houses on an area already prone to flooding is counterintuitive.
- The ancient lanes and hedges are an important part of East Peckham. The main country walks that still remain for the East Peckham residents are important. There is much enjoyment derived by local people of the public rights of way which is teeming with wildlife.
- The character of the ancient rural hamlets which make up East Peckham must be preserved. It is important to preserve the open spaces between different hamlets. If the spaces are permitted to be developed then the settlements will simply merge together into a small "town", but without any of the benefits of a properly planned town.
- The urbanisation of these hamlets will cause loss of general amenity for existing residents who will no longer be living in the rural community they were raised in, or that they chose to move to, but find themselves living in a conurbation.
- TMBC should make more effort to preserve and even generate woodland and natural areas rather than allowing building on them. Encouraging walking, cycling and other outdoor activity that benefits everyone.
- A key asset of Tonbridge and Malling is its tourism. This requires sensitive building of developments that blend in with the countryside.
- Flood risk is mentioned; building houses on an area with a high water table will only increase the flooding risk, not only to the houses themselves, but also to the surrounding settlements. Agricultural land that floods naturally reabsorbs water, paved driveways do not.
- TMBC's rural heartland statement is totally at odds with a large development.

- We would like to see a stronger message in support of the rural heartland of Tonbridge and Malling ensuring that any new developments are sympathetic to their location and in proportion to the character and size of existing settlements, and also to protect our agriculture and green fields. In essence, to keep them rural.
- The public bus service is sparse and inadequate and not likely to be improved should the population of East Peckham increase. The likelihood is that people moving to East Peckham would rely on two or more cars.
- If the residents are expected to work in the areas that have been identified for regeneration and growth, then it is not appropriate for them to be living in East Peckham generating yet more traffic. It would make far better sense to opt for alternatives where there are adequate road and rail links.
- Any large scale development will have a hugely detrimental effect on East Peckham. Large scale development would destroy ancient lanes and hedges, and merge the hamlets into a sprawling, unplanned conurbation.
- The East Peckham primary school is successful, highly regarded, and already very well subscribed. It could not cope with an influx of many more children.
- A large development on green-field land is not likely to be popular, sustainable or be good for the district in almost any location. We hesitate to suggest a neighbouring community being lumbered with a similar burden. We feel a better option is spreading the load. We do however agree to higher density housing being provided in the towns to a limited extent in order to maintain quality of life in these towns.
- We would also suggest a mix of affordable and market housing in every rural community, (say on average 5 or 6 per year). That could equate to 75 extra houses per village over the life of the plan. Each hamlet which makes up East Peckham can cope with some small increase, with proper input from the Parish Council; small, sympathetic developments with the possibility of redrawing village settlement boundaries in some deserving cases. These developments are likely to happen naturally anyway, so why not allow for it in the plan? This would permit TMBC planners to accept sensible proposals; if the housing need does indeed exist at the time of application, or reject then at times there is no perceived immediate need, particularly if the locals are not in favour of that development. We realise this might be less attractive for developers, a bigger development being far more profitable, but we should not be looking out for their concerns, but rather those of our communities.
- It is very important to closely monitor any change of agricultural use to industrial to stay essentially rural.
- We would like to see more restrictions placed on removal of old hedges and the like, TMBC planners should be careful to flag these up at the approval stage before it is too late.

CONCLUSION

The strength of feeling in East Peckham has been demonstrated by the high attendance and level of interest at the Open Forum held at the Jubilee Hall on 21 November 2016. We assume and hope this feeling will be turned into corresponding submissions from the public.

It is debatable whether a larger development is actually needed in East Peckham in the current planning cycle. Even if it is needed, East Peckham is certainly not a sustainable option as evidenced by the many factors outlined above. Nor is it desirable, other than to housing developers. East Peckham Parish Council therefore suggests that new development be restricted to smaller scale developments.

The new Local Plan should focus more on affordable housing in the rural areas. Developments outside the major centres should be confined to small, sustainable and appropriate developments, sharing the load around the district, and hence maintaining the rural character of the heartland.