

## 1. KHPC original response to Regulation 19 dated 19th November 2018

### Environmental Quality

Broadwater Farm contains two conservation areas which are popular with walkers, cyclists and horse riders. The proposed development in Broadwater Farm will harm this and the loss of agricultural land may reduce the national long-term capacity to produce food in an environmentally sustainable way and compromise the ability of the countryside to produce environmental goods, such as landscapes, natural habitats and tranquil areas.

The impact of the proposed Broadwater Farm development traffic taking into account the cumulative effect of other nearby proposed developments, such as 'Phase 5', Aylesford, Ditton and East Malling will have a negative impact on the areas already managed by an AQMA. The need for development is balanced against the need to protect and enhance the natural and built environment.

## 2. Proposed KHPC response to Local Plan Post Submission Consultation

**Please list the relevant material published since submission that has changed your position on the Soundness of the Local Plan, its Legal Compliance, Duty to Cooperate, Sustainability Appraisal and/ or Habitats Regulation Assessment.**

ED3 Landscape and visual impact assessment  
ED6 Habitats Regulation Assessment

**Please indicate the Policy, Policies, Sustainability Appraisal and/ or Habitats Regulations Assessment where the material has changed your position on the Soundness, Legal Compliance and/ or Duty to cooperate of the Local Plan.**

ED3 Landscape and visual impact assessment  
ED6 Habitats Regulation Assessment

**Please explain how the material published since submission has changed your position on the Soundness of the Local Plan, its Legal Compliance, Duty to Cooperate, Sustainability Appraisal and/ or Habitats Regulations.**

The additional evidence documents reinforce the original position of Kings Hill Parish Council. The parish council would like to add that the Local Plan is an unsustainable plan owing to a failure to protect the environment for the following reasons:

- a. The proposed Broadwater Farm development will be too visual on all sides. Unlike the Kings Hill development which is surrounded by mature trees and high shrubs. The visual impact assessment mentions the sunken lanes and narrow lanes (some designated "quiet lanes") should remain to be used by walkers/ horse riders, cyclers. The idea of building bridges to accommodate cars is not practical. The current residents surrounding Broadwater Farm will have their day to day lives blighted by this proposal. Removing the very countryside tranquility most of the residents strive for, especially those who commute every day into the City of London. The views from the properties on three sides will be the new proposed housing estate – which would be bearing down on their property taking away the ability to enjoy the Kent countryside.

- b. Water Lane, Lavender Road and Swan Street are currently unable to cope with everyday traffic.

Kings Hill Parish Council would also state this kind of development is not sustainable for the following reasons:

- a. The development of greenfield land will result in potential adverse impacts on surrounding wildlife and habitats. The brownfield land must be used as a first option as this kind of development is not sustainable.
- b. The landscape value of the Greensand Fruit Belt – Malling landscape character area is considered to be of Local Value.
- c. The recent designation of areas to the south of Kings Hill (including Cattering Wood, Hoath Wood and Flite Wood) as Kent Wildlife Sites is very welcome. How was this initiated and has a similar survey of land around the north of Kings Hill also been carried out?
- d. When listing Alternative Greenspaces in the vicinity of Kings Hill, Manor Park is named but not Warren Woods and its' surrounding woodland (ED 6 Rev C, page 53). Manor Park appears to be incorrectly listed as an Accredited Country Park (it's not mentioned on the Natural England web site). This may not have a material effect on the argument in this section of the ED6 report but suggests that the information used by TMBC is incomplete/incorrect and it is the parish council's belief that Warren Woods is ancient woodland.