

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

Infrastructure

The Parish Council believes that the Local Plan is unsound based on the impact on the highway network.

The transport assessment carried out by TMBC in 2017 shows that by 2031 the degree of saturation for the A228 and Tower View is acceptable. The Parish Council has deep concerns that this is inaccurate. In the 2011 census 76.8% of people travelled to work by car (Kings Hill, Wateringbury, West Peckham, Mereworth). With the proposed housing at Borough Green Gardens and Broadwater Farm should this percentage continue or increase (due to the lack of suitable bus or rail network connections) the intensification of traffic would far outweigh the capability of this road network.

This is exacerbated when there is an accident or incident that takes place at any point along the A228, A20 or M20. This happens on a regular basis; the incident on the A228 on 25th April 2018 caused the entire area to be gridlocked for 8 hours.

Most recently on 8th November, due to a broken down lorry and an incident on the M20, the journey from Tower View to junction 4 of the M20 took on average 1 hour. On 13th November 2018 a lorry had caught fire at junction 7 of the M20 and the journey from Tower View to junction 4 of the M20 took an average of 35 minutes. This journey should take on average less than 10 minutes. There are incidents of this kind on a regular basis despite the transport assessment stating the capacity of the Tower View/Ashton Way junction will be sufficient. With the proposed housing numbers stated in the Local Plan this seems impossible.

The parish council would also emphasise that the proposed increase in housing will mean that many more cars will be using the M20 from junction 4, due to it being the strategic link between London, M25 and the channel tunnel/ ports. The motorway is already stretched at peak times between junctions 3 and 5 and the amount of housing that is being proposed locally is too great for the road and local motorway network. The extra housing will impact on traffic flow causing delays, congestion pollution etc. The current alterations to smart motorway were planned and implemented before these latest housing targets and therefore cannot have been considered in that context.

In the traffic assessment TMBC agree that Malling Road/Gibson Drive junction is currently operating beyond theoretical capacity however the parish council has not seen any plans of how this is going to be addressed and has severe concerns for the movement of traffic in this area following the proposed development. The Infrastructure Delivery Plan does not give enough detail for the parish council to agree that this Local Plan is sound.

The Parish Council conducted its own traffic survey of cars leaving Tower View/Ashton Way junction. This showed an average of 750 cars leaving between 8am and 9am. This does not include the already approved 600 homes currently being built in phase 3 and the proposed 538 homes being put forward in 'Phase 5' of Kings Hill by the developer which may be approved before the Local Plan takes effect.

As already mentioned, there is a lack of sufficient bus or rail network connections this can be evidenced by the fact that train services to London are standing room only and school buses to Tonbridge are taking up to 90 minutes with children being forced to stand.

In the event of a significant development taking place on Broadwater Farm the Parish Council strongly believe that there should be vehicular access to the existing Kings Hill development and the new access road to the A228. This is because otherwise the traffic issues already discussed on the A228 will be compounded by significant vehicular movement between the Broadwater Farm development and the existing Kings Hill Development as residents travel to and from the schools, shops leisure and health facilities.

The Parish Council supports the suggested key pieces of infrastructure such as primary and secondary schools mentioned in LP30. The current health services available in Kings Hill, West Malling and Leybourne are poor; the availability of appointments is overstretched. The GP surgery in West Malling is being closed and there is no detail of any proposals to cope with the significant increase of the development in this Local Plan.

The Parish Council supports the comments made by Mr Tom Tughardt MP.

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.
ED5 M26 Jn2a Merge Diverge Highway Assessment Report ED25 Regulation 19 stage: main issues and the Council's responses. ED6 Habitats Regulation Assessment Rev C ED13 Sustainability Appraisal Addendum Report.
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.
ED5 M26 Jn2a Merge Diverge Highway Assessment Report ED25 Regulation 19 stage: main issues and the Council's responses. ED6 Habitats Regulation Assessment Rev C ED13 Sustainability Appraisal Addendum Report.
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.
Kings Hill Parish Council believe that the further evidence compounds the issues raised in its original response but would like to raise the following additional comments with regard to the Local Plan being unsound:- a. If the proposed Broadwater Farm development is approved in the Local Plan a suitable junction must be installed to ensure safety of motorists on that road. b. The current road infrastructure has insufficient capacity to cope with the traffic generated by proposed development.

- c. The doctors' surgery in Kings Hill has already closed its books to new residents and is unable to cope with the current residential demand.
- d. Also, should the Broadwater Farm development go ahead, residents will want to use Kings Hill and West Malling retail shops/ restaurants etc. Where are they going to park?
- e. There is not an equitable distribution of new houses across the borough. Proposed housing development should be spread more evenly across the borough and should be proportionate to the size of existing settlements and local infrastructure.
- f. TMBC has not used the most up to date statistics and should use projected housing need figures from 2016, this would mean 2,000 less houses. The OAN of affordable housing should be updated and consideration should be given as to whether additional housing allocations, including rural exception sites, are required in order to meet this increased need.
- g. The balance of the strategy is unnecessarily reliant on strategic sites of which there is significant doubt about delivery.
- h. The Plan does not propose enough employment land, there should be a proposal for 46.8 hectares. The land being made available for new employment opportunities are not commensurate with the likely increase in the economically active population.
- i. Evidence highlights that the office campus model of Kings Hill is increasingly being rejected in favour of smaller more flexible floor space. However, there is a lack of policy in this respect.
- j. There is no economic growth proposed.
- k. Part 5 c) 'the conversion or change of use of an existing building' needs some caveats as not all buildings will be suitable for conversion or desirable to retain.
- l. The conversion of existing buildings may not always meet the key test of conserving and enhancing AONB's as required by national planning policy.
- m. The policy is inadequate as it doesn't provide sufficient guidance as required by the NPPF.
- n. Particular guidance is lacking for farm diversification and equestrian use, replacements and conversions, infilling and development that is necessary for forestry or agriculture, affordable housing where found to be acceptable under policy LP6, and any other development where found to be acceptable due to exceptional circumstances.
- o. Kings Hill was developed as a mixed commercial and residential development which by around 2003 had approximately 5,000 in employment and approximately 3,500 residents. A small retail centre and doctors' surgery supported this small rural community.
- p. Sixteen years later the commercial area is underutilised but there are now over 10,000 residents.
- q. With the area known as Phase 3 currently under construction a further 2,000 or so residents will be added to Kings Hill and should the areas known as Phase 5 gain planning approval, a further 1,500 residents will be added increasing the overall population to £14k.
- r. Within 5 years Kings Hill will be a sprawling housing estate with upwards of 14,000 residents and the infrastructure designed to support a mere fraction of this number. And this doesn't include the peripheral developments such as those in King Hill which will be approximately 150 dwellings.
- s. Under LP5 (ED6 Rev C, page 154) Kings Hill appears to have been reclassified as an Urban development, presumably based on the number of residents, and that appears to now be used as a justification for approving other development, such as Broadwater Farm, without sufficient consideration of the already stretched and often failing infrastructure in Kings Hill (except a minor reference to need for further health provision).
- t. Under LP34 (ED6 Rev C, page 171) Kings Hill is a "mixed-use development" with opportunities for offices, R&D, light industrial and so on. Should Phase five plans be approved, there will be no further land in Kings Hill for new commercial development as the last few small vacant

plots within the commercial zone will be infilled with residential properties.

- u. The Broadwater Farm development is expected to include a necessary Primary school and a Secondary school. Primary schools generally have a small catchment area so this makes sense, but secondary schools are often chosen for other reasons than locality and often have catchment areas in the wider area of Tonbridge & Malling borough. Transportation of students to and from the new Secondary school from outside the new development and transportation of students to and from the new development to Secondary schools outside the new development will generate significant increases of traffic on the already heavily utilised Ashton Way (A228) during rush hour and late afternoon.
- v. Potential traffic increases on Ashton Way during the Local Plan timeframe:
- w. Kings Hill will grow by 700+ dwellings (Phase 3) and possibly 500+ dwellings (Phase 5) adding to the traffic to /from Kings Hill.
- x. Additional lorry movements are expected from the anerobic digester at Blaise farm.
- y. There will be additional traffic from the 800+ dwellings in the Broadwater Farm development.
- z. There will be additional traffic from the approved development around the “Startled Saint” site.