



By the Community, for the Community

31 January 2019

Ms Maria Brown
Tonbridge and Malling Borough Council
Planning Control
ME19 4LZ

Planning Application Number: 18/03008/OA

Address: Development Site East of Clare Park Estate,
New Road, East Malling, West Malling, Kent

Proposal: *“Development of the site to provide up to 110 dwellings
(Use Class C3) and the site access arrangement.
All other matters reserved for future consideration”*

I write on behalf of the East Malling Conservation Group to provide you with our comments on the above-mentioned planning application.

Introduction & Background

I would refer you also to the comments submitted by EMCG in relation to the Draft Local Plan s19 consultation in November 2018 relating to substantially the same site which was the subject of Draft Local Plan Policy LP25 (Reg.19 Plan Paragraph 5.1.4). To summarise, in relation to the proposal to develop this site EMCG was of the view ideally the site should be removed from the Local Plan and not developed. However we further commented, in a pragmatic response, that should the development of the site be considered acceptable by the Authority for inclusion in its draft Local Plan then the density and scale of the development should be reduced to less than 100 dwellings and should be proportionate to the very sensitive location in the village between two conservation areas. We further noted that careful design consistent

with the East Malling Village Design Statement could perhaps help mitigate the damage to the setting of heritage assets, Bradbourne House, its stables and park and St James the Great church.

The cumulative impact of this proposal and others on existing traffic issues and perceived inadequate physical and services infrastructure provision were also significant concerns of our members and others attending public meetings which fed into our Reg 19 Draft Local Plan representations - and these aspects continue to greatly concern affected East Malling residents. The traffic studies undertaken to date have concentrated on major routes, notably the A20 corridor and do not in our view adequately measure or consider traffic issues and difficulties experienced in East Malling. We believe a proper traffic impact study for East Malling Village should be undertaken (to the costs of which the owner/developer of this site may be persuaded to contribute) to fully consider the issues and how cumulative effects of development on the environment and residents' quality of life (in terms of traffic, deteriorating air quality/pollution, noise etc), so far unmatched by appropriate infrastructure investment, can be mitigated or ameliorated.

Current Application (TM 18/03008/OA)

Subsequent to the making of those representations and comments in relation to the Draft Local Plan, the outline planning application now before the Authority has been submitted and we would ask you to regard previous relevant comments to be considered as equally relevant to your consideration of this Application.

The Outline application represents a significant reduction in the number of dwellings proposed from earlier suggestions and at 110 dwellings accords more closely with our view as to what may be appropriate and proportionate which is therefore a welcome improvement. Similarly we note that the access point is now proposed at a point further to the north which we assume responds to criticism of the previously suggested access.

Whilst we accept, with reluctance, that development of the site may be necessary in order to meet current and future housing need in the area we would ask that the following comments be considered:

- 1) **Impact on Heritage Assets:** Overall we are concerned to ensure the minimum adverse effect upon the character of the village and particularly its heritage assets, notable amongst these being Bradbourne House and St James the Great Church and their inter-relationship. The Applicant's submitted "Design and Access Statement" (December 2018 – Savills UK Ltd) recognises at p23 the "*prominent vista between St James the*

Great Church and Bradbourne House” and at p17 notes the “mature tree planting to the west of the ornamental lake, which is a characteristic of the historic setting of the House will be enhanced by additional soft planting and landscaping to enhance the screening and limit the impact of the development upon the significance of Bradbourne House.”

Whilst such measures to mitigate the impact of the development are to be commended, we are concerned that this is an outline application only and that the aspirations of the Design and Access Statement cannot be guaranteed unless secured by appropriate conditions or through formal planning agreements binding upon a future developer of the land. **We therefore request that any consent be conditional upon the production of a detailed Landscape Impact Assessment and Strategy to incorporate the required screening, planting and other aspects to mitigate adverse impact.**

The site already includes or is related to significant landscape features including mature trees and watercourses which require close attention to preserve and protect through any construction and subsequent use of the site and its surrounds. We assume that any outline consent will include suitable conditions to provide this protection, but would be grateful for confirmation.

We note the comments provided by English Heritage in their consultee response letter to you (dated 23 January 2019) in which they request further detail as to landscape and screening proposals including summer and winter visualisations. We would echo their advice that “If your council is minded to approve the application we think the condition relating to landscaping layout and the design of the development will be critical to ensure that harm is further minimised at the reserved matters stage.”

- 2) Access:** As previously indicated in our comments on the Reg 19 Draft Local Plan Proposals, we advocate the re-opening of a previous access route to the north of the site, locally known as the “Blue Gates” (although the gates were long ago removed and the entrance bricked up). This has significant advantages in terms of improved sight-lines and would minimise the damage to the listed Bradbourne Estate wall. **We note that the subject application no longer includes the relevant land. Nonetheless we would request that this option be thoroughly explored with the applicant and any other parties concerned (eg**

National Trust / English Heritage) before acceding to the application proposal.

We note that the detail relating to the position, design, layout, demolition and alteration works to create the access road is, presumably for technical/legal reasons, the subject of a separate planning application (Ref TM 18/03042/LB) and we shall therefore write separately with regard to comments on that application.

We would of course expect that both applications will be considered together and that no consent will be granted for the access (and works to the Listed wall) without simultaneous conditional consent for the appropriate controlled development of the site to which it affords access.

We would like to be assured that the access point selection optimises the preservation of the Listed estate wall and minimises the extent of any alterations. We would therefore suggest that if the prevailing speed limit on New Road is a contributing factor in the extent of demolition and alteration needed to secure the sight-lines, active consideration should be given to reducing the speed limit from 40mph to 30mph for the whole of New Road from the A20 junction to East Malling village. This we consider is appropriate on grounds of safety for existing pedestrian and other users (such as the increasing number of school children walking to East Malling schools) and to safely accommodate the additional junction proposed together with the increased vehicle, pedestrian and cycle movements of the new residents.

We also note that the pedestrian and cycle access to the southern part of the site suggested in a previous iteration of the scheme for the site has been omitted from the application now submitted. We consider this a regrettable omission and would request that the Authority seek to secure restoration to the proposed development scheme of a suitable pedestrian and cycle route by which the residents can reach the village centre and access sustainable transport options (train, bus) and village services (eg St James the Great Church, King & Queen PH, East Malling Institute etc.).

We further note that the submitted Design and Access Statement, (December 2018, Savills UK Ltd) includes a proposal for a new dropped kerb crossing on New Road to the south. In our view the

crossing point should, in the interests of residents and general pedestrian safety, be updated to a formal crossing point with a zebra or pelican (light controlled) crossing provided.

We would be grateful if you would reflect upon our comments above (taken with those of other concerned parties and consultees) in arriving at your decision.

Yours sincerely

Chairman, East Malling Conservation Group