



The Planning Inspectorate  
The Square  
Temple Quay Room 3 O/P  
Temple Quay House  
2 BRISTOL  
BS1 6PN

22 September 2020

Dear Sir / Madam

**Appeal Ref: APP/H2265/W/20/3256877**  
**Development Site Land West of Winterfield Lane East Malling West Malling Kent**

This Representation relating to the above Planning Appeal is submitted by the East Malling Conservation Group ("EMCG") which is a voluntary group with about 120 members who are mainly residents of East Malling.

EMCG's prime objectives are to conserve the village heritage, its buildings, rural character and natural environment and to contribute to the management of change of in a way which will benefit the village as a whole. Our group has been closely involved in shaping the development of East Malling for over 30 years including through the previous two Local Plan cycles and, during 2018 and 2019, the new Local Plan which is currently undergoing Examination by the Inspectorate.

EMCG strongly objects to this Appeal and to its subject Planning Application TM/01814/OA submitted by the Appellant.

We have previously submitted representations in relation to the applications to develop this site made by the appellant in our letters dated 11 September and 3 November 2019.

As well as submitting this written representation, EMCG requests to be allowed the opportunity for a representative to speak at the hearing for this Appeal. We would be grateful if you would advise arrangements for this in due course.

(2)

EMCG objects to this Application and Appeal on the following grounds:

1. Not only would the development on this site not be allowed under Tonbridge and Malling Borough Council's ("TMBC's") current Local Plan Policies, but TMBC has considered the site important enough to give it even greater protection in the new Local Plan currently in the Examination stage. The decision to give this site Green Belt protection was taken after months of public consultation and with great popular support from residents of the Borough.
2. This application site comprises best and most versatile agricultural land and is designated in the current TMBC Local Plan as countryside, on which a development such as proposed in the Appellant's application would not be permitted. It cannot be right to destroy 18 acres of good quality agricultural land which has been under continuous cultivation for generations.
3. The "Call For Sites" exercise for the new Local Plan rejected this parcel of land, due to its importance in achieving and preserving an important green space providing separation between the settlements of East Malling, West Malling, Larkfield and Leybourne which is also greatly valued by residents.
4. TMBC has identified a more than sufficient supply of new housing under the new proposed Local Plan to mean that these proposed houses will not be needed. The Borough Council has a good reputation for providing new homes and has always exceeded targets set by Government, notwithstanding the fact that the current theoretical position, due to delays in adopting the new Local Plan, is that the 5 year forward land supply for housing is not currently in place.
5. The extension to Green Belt proposed in the new Local Plan is a critical element of the Plan, to prevent the historic villages of East Malling and West Malling from becoming merged together and joined into one large sprawl with the other nearby settlements of Kings Hill, Larkfield and Leybourne and through them to the greater Maidstone conurbation. The viability of this crucial Green Belt extension, and with it the new Local Plan, would be fundamentally compromised if this Appeal were to be allowed. The new Local Plan meets all the government's housing targets and at the same time respects the localism of the planning process without any need for this completely inappropriate proposed development. The new Local Plan demonstrates clearly how the proposed Green Belt extension fully complies with NPPF criteria for changes to the Green Belt
6. The proposed development would have an adverse impact on, indeed completely destroy, the setting and views in and out of a well used and highly valued rural footpath. Local residents, including many local commuters to West Malling Station, use this footpath on a daily basis and have done so for many years. It gives views of the North Down AONB and residents enjoy walking through the fields throughout the year, enjoying the various birds and other wildlife along the way. To replace this traditional rural footpath with a footway through a housing development with hard landscaping and street-lighting would completely ruin the valuable contribution this local amenity makes to the well-being of the community.

(3)

7. As regarding transport and access, EMCG is unclear which version of the Appellant's planning application is being appealed, and so we wish to comment at a detailed level on this point as follows:

- The planning application, as originally submitted, included a link from London Road, through the development to Winterfield Lane close to its junction with Chapman Way. This would create a "rat run" from the London Road to West Malling Station and also through the village of East Malling for destinations to the south. The result would be a severely damaging impact on the locality - as documented in EMCG's response to TMBC regarding the original planning application. If it is this version of the Application that is being appealed, then our detailed comments are available in TMBC's records.
- We understand that due to our comments and many other similar comments from residents and other interested parties that the Appellant removed this link road from its proposal in favour of pedestrian and emergency vehicular access. If it is this version of the planning application that is being appealed, then we would still have concerns that the pedestrian and emergency vehicular access onto Winterfield Lane would be excessive and would undermine this important landscape especially at this is an outline Planning Application which we fear that this could be amended at a later date to permit full vehicular use. We are also concerned that any enlarged access onto Winterfield Lane will harm and irrevocably damage the character of this country lane.

For all the above reasons we consider this application and appeal to be potentially damaging to the good planning and development of the area and that it is opportunistic pending the approval of the new Local Plan. We therefore wish to lend our support to the Local Planning Authority, Parish Councils and others objecting to the appellant's proposed development and respectfully request that this Appeal be refused.

Yours faithfully,

For and On behalf  
**East Malling Conservation Group**