

Tunbridge Wells Local Plan Hearing
Day 14: Friday 24 June 2022
Matter 7 Residential Site Allocations – Issue 2 –
Pembury

This is the formal response from Pembury Parish Council in relation to the above hearing session as part of the Tunbridge Wells Local Plan examination.

Where a question has not been answered, this is because it is considered that Tunbridge Wells Borough Council (TWBC) is best placed to prepare a response.

AL/PE1 – Land Rear of High Street and West of Chalket Lane

Q4. What is the justification for the proposed car park? Why is a public car park in this location necessary?

The site is adjacent to Pembury Village Hall, which is well-used by local residents' groups, the Parish Council and other organisations for a range of activities. The facility has two rooms to hire, including a large hall. Currently there is car parking available for approximately four cars and access is limited. This is insufficient for the facility and further car parking would be supported. There is not a lot of space publicly available beyond the Village Hall as the High Street has yellow lines and a cycle lane further east, and the remainder of car parking is for residential use.

The provision of additional car parking at the Village Hall would be a positive contribution from the site allocation.

To note, the emerging Pembury Neighbourhood Plan, which is about to commence Regulation 14 consultation, supports the provision of additional car parking at the Village Hall, including provisions for electric charging points.

Q5. Does the site allocation AL/PE1 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?

The emerging Pembury Neighbourhood Plan includes a comprehensive design guide, which adds additional local detail to the Kent Design Guide and High Weald Design Guide. It is considered that this should be used to inform the future development of this and other sites, to ensure that they are in-keeping with local character.

Q7. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridleway network? What is required of development proposals?

In consultation with the site promoters and TWBC, the Parish Council is aware of proposals for a new cycleway and footpath to be developed within sites PE1, 2 and 3, with connectivity across all three sites. The site promoters are understood to be in discussions about how the new paths will link together as clearly this will form an integral part of their designs.

The Parish Council is fully supportive of the inclusion of a new cycleway and footpath across the sites. What is not absolutely clear is where the cycleway and footpath are intended to link up with the existing cycle path at Woodsgate Corner. Currently there is an unofficial cycle path in the High Street which is neither safe nor usable due to car parking being allowed along its total length.

There needs to be a commitment within the Local Plan to greatly improve the High Street cycle path. In early discussions with TWBC, it was proposed that the High Street would be redesigned to include traffic calming measures and a dedicated cycle lane. The Parish Council is not aware that this is a confirmed development.

Q8. Policy AL/PE1 (11) requires a legal mechanism to be put in place to ensure that the provision of the additional car parking for the adjacent village hall and the public is tied to the delivery of the housing, at a suitable stage of the development. What is the justification for this requirement, and will it be effective?

As stated in Q4 response, the Parish Council considered that the provision of additional car parking space within Site AL/PE1 to serve the Village Hall is well justified. With a management plan regarding the use of the car park, it will be made effective.

AL/PE2 – Land at Hubbles Farm and South of Hastings Road

Q12. What is the justification for the inclusion of an area of safeguarded land? Is an extension to the cemetery needed and how and when will it be provided?

The Parish Council considered that the inclusion of an area of safeguarded land to enable an extension to the cemetery is fully justified.

The current cemetery has 15-17 years space remaining. The Parish Council considers that it has a duty and a moral obligation to make provision for the future burial and/or cremation burial requirements.

The land identified will require space for a road and turning circle to access the site from the current cemetery. Planning for an extension and position of the road access will begin with the local plan is finalised.

In estimating the amount of land required, the Parish Council has taken note of the current government discussions about the future regulations governing the size and depth of future sites. Indications from these initial discussions show that individual sites

will need to be larger and more spaced out, which will take up more space than currently used in the cemetery.

Q13. Does the allocation AL/PE2 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the characters and appearance of the area, including the AONB, been considered as part of the plan-making process?

The emerging Pembury Neighbourhood Plan includes a comprehensive local design guide, which adds additional local details to the Kent Design Guide. It is considered that this should be used to inform the future development of this and other sites, to ensure that they are in keeping with local character.

In relation to the development of PE2, it is considered that proposals need to consider the important habitat on-site which include trees and hedgerows. In addition, there are views from the public footpath (WT239A) which runs along the ridge on the southern side of the site. This raised part of the landscape affords sweeping views across the High Weald to the north, and these should be retained, where possible. A view across the cricket field and to the Church beyond from the same footpath is also considered to be particularly important by the community, as approached from the historic routeway to the south. Again, glimpses of this view should be retained for their historic value.

Q14. Where will the main access to the site be taken from?

Access to the residential aspect of the site will need to be determined.

The main access to the safeguarded land will be from the current cemetery. The exact position is yet to be surveyed as it will have to take into account the position of the current burial site, the footpath and cycle way and its link with site PE1.

Q15. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridgeway network? What is required of development proposals?

Please see answer to Q7 in responses to the PE1 site. In addition, the exact positioning of these is not yet confirmed but is likely to follow footpath WT239A.

Supplementary Issues for Site AL/PE2:

The site promoter has queries with the Parish Council the need for an extension to the cemetery. They have suggested that a smaller area should be safeguarded, and the remainder of the space should house a children's play area, to be located to the end of the cemetery adjacent to the proposed residential area.

The Parish Council consider this to be a most unsuitable position for a play area, which ideally should be sited within the proposed residential area. This would maximise opportunities for safe access and also for the supervision of children. In addition, it is considered that the closeness of a playground to the cemetery, would not be conducive

to the atmosphere expected, where the cemetery is frequently used for burials and as a place of remembrance.

It is clear that the safeguarded space will not be required in the very short-term. The need for an extension to the community cricket club, which has been located next to the area since the nineteenth century, has been identified as an issue. In response to the cricket club, the Parish Council is setting up discussions with them to ascertain exactly what they would require so the Parish Council could consider a "meanwhile" use until the burial space would be required.

Finally, the site promoter has also mentioned to the Parish Council the idea of providing tennis courts in the safeguarded area. The Parish Council considered that adequate provision is in place at the Lower Green Road Recreation Ground. Local engagement, in particular through the Neighbourhood Plan process, has not revealed an unmet demand for such provision.

AL/PE3 – Land North of the A21, South and West of Hastings Road

Q19. Does site allocation AL/PE3 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?

This area identified for development is the only one that is well used by the local residents for a variety of recreational purposes. It also has a well-used footpath (WT237) running along one side of it.

The land rises considerably from Hastings Road up towards the ridge and the A21, which has the possibility of obscuring well appreciated views across the village, the High Weald and as far as Matfield and the North Downs beyond. This is a view that has been identified as particularly significant as part of the Neighbourhood Plan process.

In addition, the houses on the Hastings Road part of the site, may lead to unacceptable loss of amenity for existing houses, through the loss of privacy, loss of light or visual intrusion.

The proposals for this area raised the most concerns amongst the residents of Pembury.

As per Q5 and Q13, a Local Design Guide for Pembury has been developed and it is anticipated that all proposals in the Parish should follow the guidance as set out, and in the context of the Kent Design Guide and the High Weald Design Guide.

Q20. Where will the main access to the site be taken from?

There are current problems with traffic movements in this area due to cars parking along both sides of Hastings Road and, on many occasions when the A21 is suffering heavy traffic congestion, a much higher volume of traffic choosing to take the slip road into

Pembury hoping to avoid a long wait in a traffic jam. This is a long-term issue, which the Parish Council has been unable to resolve in spite of many representations to National Highways, who manage the A21, and to Kent County Council Highways with whom they need to consult.

It is valid in relation to this site allocation in respect of the potential traffic that might be caused by this site (cumulatively with the other sites) and the additional pressure it will place on the already stretched village road network. In addition, it is not clear how the foot- and cycle path through the site will connect on the east to the existing public rights of way network.

Q21. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridleway network? What is required of development proposals?

Please see answer to Q7 in response to PE1 site.

AL/PE4 – Land at Downingbury Farm, Maidstone Road

Q25. What is the justification for the inclusion of an area of safeguarded land? Is an extension to the Hospice in the Weald needed and how and when will it be provided?

From the Parish Council perspective, it is considered that the safeguarded land is required for the extension of the Hospice.

The Parish Council has spoken to the Deputy Manager of the Hospice, prior to his appointment as Manager, who made it clear that there was a need for expansion - in terms of space for wards and facilities {as opposed to residential staff requirements) and that is in the initial planning discussion stage with the Hospice management. The Parish Council supports this development which would enhance this vital community facility.

Q26. What is the justification for not removing the area for possible future expansion of the hospice from the Green Belt?

From the Parish Council perspective, if it is removed the Hospice will not be able to expand to provide a well-respected service for the local area.

Supplementary issues for Site AL/PE4

The emerging Pembury Neighbourhood Plan process has identified the Downingbury Farm Pond as demonstrably special to the local community for wildlife and historic reasons. It is seeking to designate it as a Local Green Space. The Pembury Wildlife Group and members of the Environmental Group set up as part of the NDP discussions and some Parish Councillors (all local volunteers) are anxious to develop, maintain and promote the pond as a community asset in association with The High Weald AONB Partnership.

Sites AL/PES, PE7 and PE8

These three sites have all been through the planning process and have been agreed by TWBC. The Parish Council has no further comment.

Site AL/PE6

This is a late addition to the Submission Local Plan, as the original application for this site was refused. The Parish Council has no further comment.

Additional Issues:

The Parish Council would like to raise the following issues, which it previously discussed in the consultation response on the draft Local Plan:

1. In all TWBC documentation about Pembury and its services, provision for play and recreational sport has been identified as below the level of provision expected and this includes the Woodside Recreation Ground. The Submission Local Plan identifies extra sport provision at Hawkenbury and no plans for improvement in Pembury itself. For the young people of Pembury, the Parish Council considers that this is inappropriate due to the lack of suitable transport, safe walking or cycling provision and likely to cause even more congestion along Pembury Road which is already very crowded.

The suggestion of a possible cycle route from Pembury to Hawkenbury is likely to be fraught with problems over land ownership and cost of providing suitable surfaces and its maintenance. Not all young people will have cycles or be allowed to use this route especially with the need to carry sports equipment and clothing.

2. Throughout the Local Plan process, the Parish Council has consistently raised problems with drainage and raw sewage when heavy rain occurs. This is as a result of an outdated drainage system, notably in the southern part of the village, which comprises a shared drainage carrying both sewage and excess surface water. Heavy rainfall events quickly lead to lack of capacity and overflow. The primary school has reported sewage overflows on numerous occasions.

It remains the view of the Parish Council that existing problems will be exacerbated as a result of increased housing and a workable solution must be required for developments along the A21.

3. The issue of providing sufficient infrastructure to cope with increased traffic and people services has, in the Parish Council's, view not been fully evidenced. Further certainty is required about how current pressures to the provision of GPs, schools, and roads for instance, would be welcomed.

4. Pembury has retained a "village atmosphere" and the Parish Council wishes to retain this. Work on the Pembury Neighbourhood Plan has demonstrated that this is extremely important to local residents.

Traffic congestion and speeding are consistently raised as local issues. Whilst it is understood that a traffic calming system for the three main roads of Pembury (Hastings Road, High Street and Lower Green Road) sits within the remit of the highways authority, there are design practices that can be employed to enable such schemes. These are reflected in the Pembury Design Guidance and would go a long way to mitigate the likely increase in the number of residents in the future. Such design features should be supported by the Local Plan.

Cllr Graham Hall

Chair, Planning & Highways Committee
Pembury Parish Council