Attn: Jennifer Begeman

24/02085/OUT | Outline (Access only) - Demolition of existing residential, farm buildings & equestrian facilities, development of 99 dwellings with associated landscaping, cemetery expansion & associated infrastructure | Hubbles Farm Hastings Road Pembury Tunbridge Wells Kent TN2 4JP

I am writing on behalf of Pembury Parish Council (PPC) in response to the planning application noted above. We are very familiar with the site and have carefully considered the application.

Whilst we understand that the application relates to a site allocated for strategic development in the Submission Local Plan (SLP), we wish to object to the proposal as currently submitted.

Until the Submission Local Plan is adopted, the policies of the adopted Development Plan remain in force and the principle of development in this part of the parish is not established. It is therefore pre-empting the new Local Plan.

When considered against the policies of the Submission Local Plan, notably Policies PSTR/PE1 and AL/PE2, we consider that the application as presented does not meet the policy requirements. Furthermore, there are aspects of the application that do not fully align with the Pembury Neighbourhood Plan (PNP), which was made in October 2023 and forms part of the Development Plan for the Borough.

We also have comments on other parts of the proposal.

Notwithstanding the fact that the principle of development is not established in this part of the parish, we have set out our comments below, focusing predominantly on the alignment to SLP Policies PSTR/PE1 and AL/PE2 and the PNP.

Yours sincerely

Helen Munro

Parish Clerk, Pembury Parish Council

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### 1. Footprint of and uses across the site

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P1

- 1.1. We wish to object to the Application on the basis that the principle of development on the land covered by the site is not established as the new Local Plan is yet to be adopted. The site falls outside the Limits to Built Development and does not, when judged against adopted Local Plan policies, demonstrate exceptional circumstances to release it from Green Belt.
- 1.2. We would also wish to make it clear that contrary to Paragraph 6.2.5 of the Planning Statement, the site is not an allocation in the Pembury Neighbourhood Plan. That plan makes it clear beyond doubt, that it does not allocate any sites for development. It is to correct to say that the site has been referenced in the PNP.
- 1.3. Furthermore, when considered against the new Local Plan policies, it does not accord with the proposed site allocation in SLP Policy AL/PE2 in terms of the site boundary and associated uses across the site. The map associated with Policy AL/PE2 (Figure 1) clearly shows the site allocated to include land at the west safeguarded for cemetery use (shown in pink). The area designated for residential use sits outside this safeguarded area (shown in orange). See also Clause 3 of Policy AL/PE2.

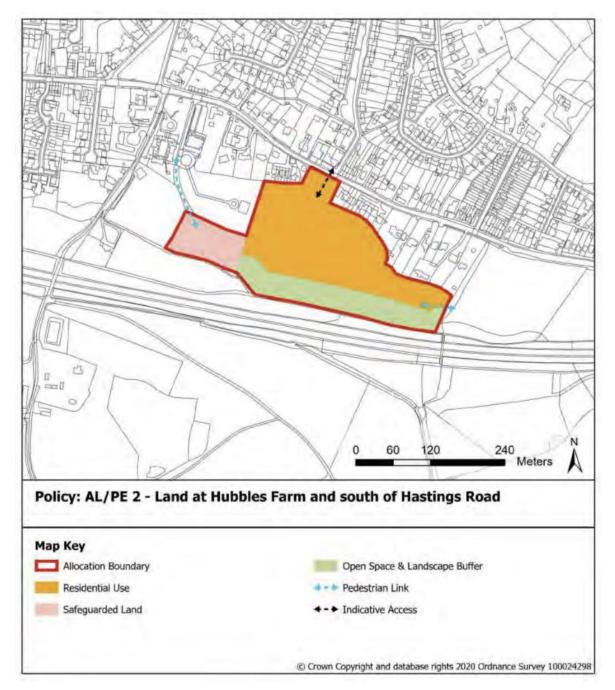


Figure 1: Site allocation as per Submission Local Plan

1.4. This is reflected in Policy P1 of the PNP, which forms part of the Development Plan and which shows both the existing (adopted) Limits to Built Development and those proposed once the SLP is adopted (*Figure 2*). The Figure clearly shows that the area of the proposed site allocation that is not proposed for residential use (i.e. the land safeguarded for cemetery use and the area to be a landscape buffer) do not and will not sit within the Limits to Built Development. Policy P1 of the PNP sets out the criteria against which any development in such areas must meet, which is not in line with the Application as currently presented.

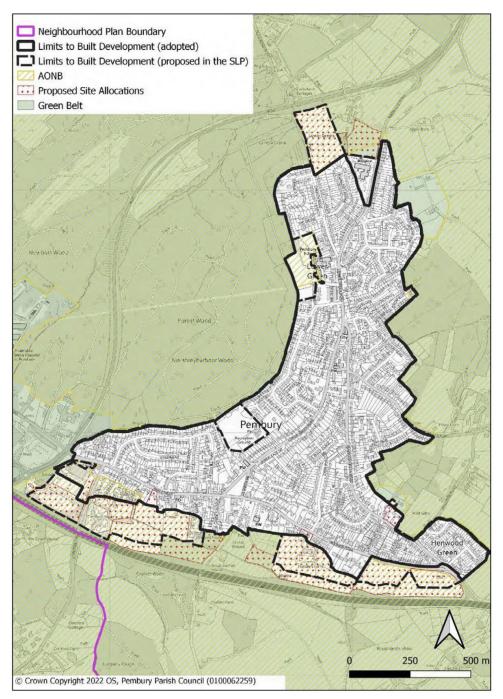


Figure 2: Limits to Built development in the 'made' PNP

1.5. The proposal itself is confusing on this matter. *Figure 3* shows the site as presented by the Applicant. The area to be safeguarded for future cemetery use is incorrectly marked as it extends east into the area shaded as green space. This needs to be amended.



Figure 3: Site footprint as per Applicant's proposal

- 1.6. This part of the site was discussed as part of the Local Plan Examination at Day 14 Morning Session, 24 June, Residential Site Allocations:
  <a href="https://www.youtube.com/watch?v=xayFsW07dLk&list=PLDBgjfDsk2Js3TdpP88FboA4GLbTTTbRJ&index=22">https://www.youtube.com/watch?v=xayFsW07dLk&list=PLDBgjfDsk2Js3TdpP88FboA4GLbTTTbRJ&index=22</a> (circa 1:31:00). The Inspector was not minded, as a result of these hearings, to reduce the size of safeguarded land for the cemetery. Hence it has been retained as such in the latest version of the emerging Local Plan.
- 1.7. Ensuring that this part of the site is presented correctly (i.e. as safeguarded cemetery space) is critical to the proposal and any decision relating to it because it has a direct impact on a number of matters:
  - The amount of open amenity space provided as part of the overall application and how this aligns to TWBC's quantity requirements Currently the Applicant has included the eastern part of the safeguarded space as 'open amenity space' within their proposal, contributing to their overall provision. This is not correct. The intention is that this area (as well as that to the very west) will be utilised for cemetery expansion, therefore it will not provide open amenity space in the mid- to long term. We consider that the proposal needs to therefore review its open amenity space provision as it will ultimately show a deficit.
  - The overall space available for residential development if additional land is required to address the mid- to longer-term deficit in open space, this needs to be reflected in the Application. This was discussed in the Local Plan Examination.

- The number of homes able to be delivered across the site if additional space is required to address the open space point above, this could impact the number of homes deliverable on the site. Currently the Applicant seeks to deliver 99 units. Policy PE/AL2 allocates approximately 80 dwellings. It would appear that the lower number takes into account the need for open space provision and this needs to be reflected in the application.
- <u>The biodiversity net gain requirement</u> it is unclear to what extent the safeguarded cemetery land has been included in the BNG calculations.
- 1.8. We would request that the details in this section are fundamental to the Application and the Application should not be granted until it is satisfactorily addressed.

### 2. Safeguarded land for the Cemetery

Relevant policies: SLP Policy AL/PE2; and PNP Policy P1.

- 2.1. We wish to object to the Application in relation to the way the safeguarded land is represented in the proposal.
- 2.2. As noted above, SLP Policy AL/PE2 requires land to be safeguarded for cemetery use and the footprint of this space is shown on the associated maps. The Applicant acknowledges that the western approximate half of this area is to be safeguarded for future cemetery expansion. However the eastern part is retained within the overall proposed site layout as open space. It is not referred to as being safeguarded space. This is referenced in a number of the documents submitted and is factually incorrect; it is contrary to Policy AL/PE2 and needs to be amended.

The intention is for the safeguarded land to be moved across to Pembury Parish Council's ownership from current private ownership. This was confirmed by the Borough Council as part of the Local Plan Hearings (see previous link). It is also set out in SLP Policy AL/PE2, which states that "a suitable legal mechanism shall be put in place to ensure that the provision of the safeguarded land for expansion of the Pembury Cemetery is tied to the delivery of the housing, at a suitable stage of the development, to be agreed at the planning application stage."

- 2.3. There will need to be a legal agreement to establish this as part of any Application. This is currently lacking, certainly in relation to the eastern part of that safeguarded land.
- 2.4. The Parish Council anticipate that the cemetery will be delivered across a number of phases. It would be sensible to utilise the eastern part of the site first, as this is the area with the easiest point of vehicular access. Access to the extended cemetery needs to be possible by vehicle. There are only three potential vehicular access routes into the cemetery extension. The points below relate to those shown on Figure 4. Figure 5 provides an aerial view to demonstrate what exists in the current cemetery at present:

- Point 1 the access from land adjacent to the cricket ground leading from the first roundel in the burial grounds (shown on the northern edge of *Figure 4*) is not included in the application and therefore is not an option.
- Point 2 –The boundary of the cemetery extension is beyond access Point 2 and therefore no vehicular access is possible due to existing graves at the southern side of the existing cemetery. Whilst the boundary and access could be moved to the east of these existing graves, PPC has concerns about whether a roadway here would be wide enough for a large hearse and construction traffic to be accommodated. It could be appropriate for a pedestrian access point, however.
- Point 3 Any access running from the second roundel to the safeguarded land would need to avoid existing graves and the cremated remains area (*Figure 5*). As such uses cover much of the southern boundary, the vehicle entry point would practicably be the south-east corner of the existing cemetery, entering the safeguarded land at the north-eastern corner.
- 2.5. This means that it is the eastern *part* of the safeguarded land that is likely to be used first, followed by the western part. A natural boundary to be provided between the safeguarded land and housing development.

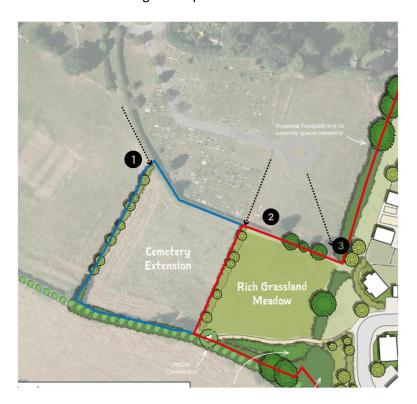


Figure 4: Cemetery safeguarded land layout and potential access



Figure 5: Aerial view

- 2.6. PPC consider that the very western part of the safeguarded land, which would be a later phase of cemetery use, could temporarily be utilised by the cricket club as an extension to their existing site. This would be an acceptable use in the Green Belt. The application is largely silent on its own considerations for use of the space (notably the eastern space) and the PPC would be concerned about any use that could negatively impact the neighbouring cemetery.
- 2.7. PPC notes that the Applicant is proposing a public right of way across the bottom corner of the eastern part of the safeguarded land. This appears to be because the Applicant does not acknowledge this *land* as future cemetery space. As above, this is contrary to policy and would not be practical in light of the need to develop that eastern part of the cemetery first (given the vehicular access constraints described above). Any public right of way could interfere with this and may also conflict with the use of the land as cemetery space. PPC would prefer access into the cemetery extension to be via the existing church entrance. We consider that a right of way link from elsewhere in the site (to the east) to connect to FPWT239 would be preferable.

### 3. Number and type of dwellings

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P1.

- 3.1. In light of our comments above, if the safeguarded cemetery space is to be safeguarded, the Applicant's proposed amenity space here would need to be redistributed through the remainder of the site so that space standards are met.
- 3.2. We consider that the Applicant will need to revise their housing numbers down from 99 (noting the site allocation is for approximately 80 on the residential part of the site).

- 3.3. The proposal will also need to meet the requirements of PNP Policy P3 (Character and Design of Development) and the associated Pembury Design Guidance (which are a formal part of the PNP).
- 3.4. Whilst detailed design is to be considered at Reserved Matters, it is vital that the Parameter Plans do not pre-empt any masterplanning. The design of homes can also assist in meeting the requirements of PNP Policy P2 (Meeting Local Housing Needs), which is **underpinned** by the Pembury Housing Needs Assessment and prioritises smaller (in terms of bedroom numbers) homes for those starting out on the property ladder and those wishing to downsize.
- 3.5. It would appear that the existing 3 dwellings on the site have been omitted from the planning application, which might invalidate that application, as there will be a net gain of 96 dwellings rather than 99.

## 4. Provision of affordable housing

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P1, P2.

- 4.1. Policy AL/PE2 requires 40% of the homes on the site to be affordable. **PPC expects the full** percentage of affordable homes (40%) to be delivered and on-site as part of any application relating to this site.
- 4.2. PNP Policy P2 requires: "At least 25% of the affordable housing units must be delivered as First Homes. Proposals that enable an uplift of 50% to the discounts provided on the First Homes element of the development to assist single occupants on median and lower quartile income, will be particularly supported. Where such an uplift is demonstrated to be unviable, proposals should provide at least a 30% discount. Such proposals should seek to prioritise those with a local connection to Pembury parish (see Glossary) and key workers." Also, on a design note, that "Affordable homes should be well integrated with market housing".
- 4.3. It says that for the affordable homes, the PNP supports "proposals that deliver an appropriate mix of affordable housing, based on a 40:60 split between social rent and affordable housing for sale (intermediate housing)." At 80 homes (as per Policy AL/PE2), 32 homes would be affordable. The Applicant seeks to deliver 99 homes, of which 40 should be affordable (this number is misquoted in the proposal and must be amended). Table 1 provides a breakdown of how these numbers should be delivered to meet the requirements of PNP Policy P2:

Table 1: Delivery of affordable homes to meeting PNP Policy P2 requirements

% to be affordable	Social rent (40%)	AH for sale (60%)
32 dwellings	13 dwellings	19 dwellings, of which
		5 would be First Homes.
40 dwollings	16 dwollings	24 dwellings, of which
40 dwellings	10 dwellings	6 would be First
		Homes
		32 dwellings 13 dwellings

- 4.4. PPC appreciate that the site is proposed as a strategic allocation, therefore there is an expectation that the mix of homes delivered will contribute to the wider strategic need across the borough. Despite this, Policy P2 of the PNP should be reflected in the proposal, as the Housing Needs Assessment prepared to underpin the policy identified a variation in the mix applicable across the borough. This is not surprising given the rural nature of Pembury when compared to the larger towns in the borough. We would request that the mix (size, tenure etc.) of homes is considered carefully against PNP Policy P2 to ensure that the site also contributes to local housing need.
- 4.5. PPC do not consider that this is reflected in the current Application. Any change to the number of dwellings (bearing in mind our previous comments) would need to meet these requirements.
- 4.6. In terms of the allocation of affordable homes, TWBC advises that such housing should be secured and monitored through a legal (Section 106) agreement. PPC support this approach. It is our understanding that in some parts of the Borough private homes have then been sold to a Registered Provider, who has used them to house people from outside the parish and wider borough. We consider that such an approach is inconsistent with the Local Plan and the PNP in terms of addressing local housing needs and should be avoided. For all affordable housing provided, a local connection cascade must be required. For the First Homes element of provision, PNP Policy P2 requires that this includes, as a priority, those with either a direct link to Pembury Parish and/or keyworkers.
- 4.7. We would expect the full quota of affordable housing (40%) to be secured via a s106 legal agreement. The affordable housing mix must reflect PNP Policy P2, notably in respect of the percentage to be provided as First Homes. An uplift on the discount provided on the First Homes element (and wider affordable housing) would be supported.
- 4.8. A condition should be applied to ensure that Affordable Homes are allocated to those with a local connection (and in the case of the First Homes element, allocation should prioritise those with a local connection to Pembury Parish and/or key workers before following the local connection cascade).

#### 5. Drainage

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P5

- 5.1. Policy P5 of the PNP clearly evidences the existing problems relating to drainage and sewerage, which is exacerbated by the fact that there is a combined antiquated sewer/drain network in this part of the parish. This has led to raw sewage spilling to ground level in the streets, in some homes and in the Primary School. There are numerous wells and natural springs in the area (including, for instance, two wells at 54 Hastings Road). Not all are fully documented.
- 5.2. With the increasing number of heavy downpours now being experienced as a result of climate change, we do not consider that the provision of an attenuation pond and infiltration measures will be sufficient. Paragraph 6.11.7 of the Planning Statement sates:" If these works determine that infiltration is not a feasible means of discharging surface water run-off, the next hierarchically preferable means of surface water disposal would be discharge to a sewer. It is clear that the existing combined sewer is overloaded already.
- 5.3. We draw your attention to the topography of the site and the steep slope down to existing homes on Hastings Road, backing onto the site. We have deep concerns that the surface water run-off from the site is not adequately dealt with in the application and will not only lead to the combined sewer being overwhelmed, but that these houses are inevitably going to experience severe flooding without further measures to alleviate the danger being put in place. There is also likely to be flooding along the Hastings Road.
- 5.4. We note that Southern Water has not commented on the Application. Their holding response suggests that a comment will be made, but the date provided falls beyond the formal consultation period. We reserve the right to make a further comment after we have seen Southern's Water's response.
- 5.5. PPC note and support the comments of Kent County Council's (KCC) Flood and Water Management asking for additional information to be submitted and a recommendation not to progress the application at present until this is provided and assessed. We reserve the right to make further comment after this additional information has been provided and KCC have commented.
- 5.6. The Upper Medway Internal Drainage Board have flagged a potential conflict between the planning process and the Boards regulatory regime that needs to be resolved before the application is progressed, which view we support.
- 5.7. Blocked culverts along the A21 create large puddles of standing water caused by run-off water from the footpath and top of the field that runs along the back of the site, from the footbridge by the Bo Peep exit to Cornford Lane. The police have been in attendance on more than one occasion when the left hand lane is closed due to flooding.

5.8. From all the above, including the comments from Kent County Council and the Upper Medway Internal Drainage Board, It seems clear that insufficient thought has been given and investigative work carried out to provide adequate surface water and foul drainage from the site. We would strongly request that decision-makers are fully satisfied that any development along the A21 takes place only once adequate drainage – for surface water and foul water - is in place. This could be achieved by way of a pre-commencement condition, including a full ground survey and infrastructure to be in place prior to housing being occupied. This is something a number of local authorities are now demanding.

## 6. Visual impact and landscape

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P3, P4, P10, P11, P12

- 6.1. We understand that the detailed design of the site would be considered at the Reserved Matters stage. Nevertheless, we request that the Parameter Plans are more closely aligned to the PNP and notably the Design Guidance for Pembury.
- 6.2. As previously noted, additional work is required by the Applicant to redistribute the amenity land currently located on the safeguarded cemetery land to across the remainder of the site, to meet quantity requirements.
- 6.3. Policy AL/PE2 requires adequate buffering and screening against noise and other impacts from the A21. This is also considered within PNP Policy P3, underpinned by the Pembury Design Guidance, which forms an integral part of the PNP. We would request that any screening is either natural in form, or if fencing is required, is fully masked by natural screening. This will help to minimise the urbanising impact of fencing in this part of the parish which falls within the High Weald National Landscape. The Applicant appears to indicate that a buffer of 23m would be adequate (although there is a typo in their material "230M"). In fact the Pembury Design Guidance states that development along the A21 must "Establish an approximate 40m green buffer band parallel to the A21 in order to mitigate visual impact to and from the AONB." The PPC would request that this is reviewed prior to any permission being granted.
- 6.4. A buffer should be included between the existing houses on Hastings Road on the northwest corner of the site between the houses and the site. Due to the sloping topography the impact of the new development will be considerable and result in a loss of privacy to the existing homes. The buffer screening should be natural in form, or if fencing is required, is fully masked by natural screening. Consultation with the neighbouring residents should be undertaken to minimise its impact.
- 6.5. We would also wish to ensure that the existing natural buffer between the site and the housing on the northeast corner of the site is retained and that the appropriate condition be imposed in any planning permission.

- 6.6. We are pleased to note that the Applicant has considered how they would mitigate the impact upon View 1, identified in PNP Policy P11 (Significant Local Views). We would request that the impact on <u>View 2</u> is also fully addressed.
- 6.7. The Application states that two mobile phone masts would be moved if the development is granted. The PPC would wish to receive further detail about this including whether permission to move these has been granted, where they would be moved to and the potential impact of this on the community.

## 7. Play Area location near to the pond

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P15

- 7.1. We are concerned about the proposed location of the play area. It is bounded on all sides by roads, including an access road into the development. This may compromise safety and accessibility, particularly for younger children. It is also located adjacent to the attenuation pond. Although the pond would be fenced, the nature of this fencing is unknown and may compromise safety of those using the play area.
- 7.2. We are concerned that the nature of the play area is not clear in terms of which ages it seeks to provide for and whether it will be large enough to do so. There appears to have been no consideration of PNP Policy P15 in the Application, which specifically talks about the need for additional teenage provision. This could potentially be addressed as the Applicant identifies additional green space in the proposal (in the context of our previous comments).
- 8. Considering the cumulative considerations and impacts in relation to other neighbouring sites

  Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P1, P3, P5, P13
- 8.1. Site PE/2 is closely aligned to the other sites proposed for allocation along the A21. We would strongly encourage decision-makers to consider the impacts not solely of this Application but its cumulative impacts when taken together with the other proposed strategic site allocations. This includes matters relating to cycling and walking provision across the three sites, the impact on local roads (notably Hastings Road) and the impact on the sewer capacity (as required by PNP Policy P5).
- 8.2. The cumulative impact of additional traffic on the wider highways network from all three sites has not been considered. The traffic hotspots of Woodsgate Corner, the Pembury Road Corridor, Bo Peep Corner junction with the A21, access to the A21 from the Pembury Road and Kippings Cross will be negatively impacted by the development concentrated in the northwest corner of the borough as identified by TWBC in their Junction Hotspot comparison. Over 87% of the proposed development in the emerging Local Plan will be in this area.

- 8.3. Bearing in mind recent droughts and water shortages, we are concerned that there will be adequate water supply to the site and that this and sewerage must be addressed on a cumulative basis for all three sites also. We have set out above our deep concerns about the drainage from the site. This will only be exacerbated by development of the other sites along the Hastings Road and High Street.
- 8.4. Water supply and sewerage must be addressed on a cumulative basis for all three sites also. We have set out above our deep concerns about the drainage from the site. This will only be exacerbated by development of the other sites along the Hastings Road and High Street.

# 9. Travel Plan & Highways

Relevant polices: SLP Policies: PSTR/PE1 and AL/PE2; PNP policy: P1, P13

- 9.1. We consider the current Travel Plan to be inadequate. We would question the likely number of car journeys suggested to stem from the site. The bus information is incorrect, as is reference to the proximity of Royal Tunbridge Wells train station being only a 10-minute drive away. Overall, the detail in this report needs to be checked and updated to reflect the real circumstances.
- 9.2. We are concerned about the amount of extra vehicle journeys created by the development of this site and the adjoining sites along Hastings Road/High Street. Whilst we welcome the applicant's offer to contribute to the junction improvements at Woodsgate Corner contained in Paragraph 7.5.10 of the Transport Assessment, we question what impact this will have on vehicles travelling in a westerly direction to the junction. Already, at peak times, Pembury Road becomes gridlocked. This is only going to be exacerbated by the development of this and the other sites, unless and until proper remedial action is taken by the Highways Authority to improve the traffic flow along Pembury Road towards Tunbridge Wells.
- 9.3. Whilst PPC may not disagree with the need for measures along Hastings Road to alleviate speeding and 'rat-running', as detailed in the PNP, we are concerned that this does not reduce the overall amount of car-parking space available along that road to existing residents. There is no information provided in the application showing the quantum of spaces lost and request that this is provided to consider the impact of the proposals on existing residents.
- 9.4. The "Parking stress survey" referred to in paragraph 6.10.8 of the applicant's planning statement is said to conclude that there is adequate capacity to accommodate any off-street parking displaced by the scheme.

#### However:

(a) the plans shown in Appendix F of the Planning Transport Assessment appear to include roads at the other end of the village including Woodhill Park and Woodsgate Way. We feel that it is unrealistic to think that residents from Hastings Road will park their vehicles that distance away from where they live.

(b) it is our understanding that discussions have taken place to extend the traffic calming measures from after this site along the remainder of Hastings Road and along the

High Street to the proposed exit from site PE/1. Further cars will be displaced if this

proposal is implemented.

(c) Again all these sites need to be looked at together.

(d) We believe that each site needs to accommodate traffic displaced by the traffic calming measures, which broadly we concur with, either on the site displacing the

traffic or in some other way to be proposed.

9.5. It is our understanding that discussions have taken place between the site promoters of PE/1,

PE/2 and PE/3 in relation to improvements to the existing cycleway between exit of site PE/1 to

where it joins the cycleway along the Pembury Road and that a financial contribution to fund

the works to be shared between the site promoters, is secured by way of a S.106 agreement for

this site.

9.6. The cumulative effect of the three sites proposed along Hastings Road cannot be considered in

isolation and we refer to point 8.1 requesting that the cumulative impacts are considered and

not on a standalone basis.

9.7. It has been proposed, as set out at 3.3.4 of the Planning Statement that a formal dropped kerb

emergency access to the west of the primary access be provided. However, we have grave

concerns that it will be sufficient to take emergency vehicles should the main access be blocked.

We urge that further advice, for example from the Fire Service, be taken and that this be dealt

with by way of a pre-commencement condition.

9.8. We note that National Highways have not responded to the application yet and we reserve the

right to make further comment after we have seen their response.

10. Economic benefit

10.1. The Planning Statement outlines economic benefits, which includes approximately 185 jobs

during the construction phase. It is unclear as to how these jobs might be filled and whether there is a genuine economic benefit to the local area, or if workers are to be brought in from

existing contracts or approved suppliers and contractors.

11. Biodiversity

Relevant policies: SLP: AL/PE2; PNP: P8

11.1. PNP Policy P8 states that "proposals that support the enhancement and management of the identified Biodiversity Opportunity areas will be supported". In light of comments above in

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relation to not using the safeguarded cemetery space as 'open / amenity space' in the application, we consider that the biodiversity net gain contributions need to be reviewed before the Application can be granted. Any off-site contributions should seek to be delivered in the parish before other areas beyond the parish.

#### 12.Infrastructure contributions

- 12.1. The Parish Council requests to be fully involved in discussions about how developer contributions are used towards parish Infrastructure priorities.
- 12.2. Local highways priorities are set out in the Pembury Parish Highways Improvement Plan and include improvements to road safety by Pembury Primary School and on the junction with Lower Green Road/Maidstone Road and Church Road and the junction of Canterbury Road with Hastings Road.
- 12.3. PPC wishes contributions to be provided in accordance with the requirements of the Supplementary Planning Document. Other infrastructure priorities set out in Policy P15 of the PNP include:
  - Improvements and enhancements to sports and recreation provision including children's and youth space
    - o Improvements to Lower Green Recreation Ground. Indicative quote £96,147.
    - New facilities for 10-15 year olds in Lower Green Recreation Ground.
       Indicative quote: £38,153
    - o Improvements to Lower Green Pavilion.
    - Reconfiguration of the Lower Green Pavilion to include a publicly accessible toilet.
    - o Improvements to Woodside Pavilion.
    - Creation of a parking area in Woodside Playing Fields. Indicative quote £25,616.
  - Allotment improvements.
    - Security measures at the Woodside Road allotment site. Indicative quote £46,370

#### 13.Dark Skies

Relevant Policies: PNP policy: P12

13.1 We request that proposals for external lighting submitted at the Reserved Matters stage comply with policy P12 to minimise the impact of light pollution.