

# THE PEMBURY SOCIETY

c/o 11 The Meadow  
Pembury  
Tunbridge Wells  
Kent  
TN2 4EH

24 September 2024

Dear Sirs,

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

Further to our letter of 7<sup>th</sup> September, we have had further time to review the Application by Obsidian in relation to Site P2 on the emerging Local Plan, and make the following representations:

- 1** We reiterate that this Application and Site P2 must be considered in the context of Sites P1 and P3 where similar applications can be expected.
- 2** We recognise the need to fulfil Government housing quotas, and the availability of these pockets of land, however we challenge the numbers of houses proposed for Pembury, (target 294-304 new dwellings) which is out of proportion to Pembury's existing population, the considerable impact they will have on the village, and the clear evidence that is now showing itself to reveal a considerable infrastructure change in the connecting roads and traffic management, even from the first of three possible applications, quite apart from other infrastructure and anticipated site P1 and P3 Applications.
- 3 The Local Plan**  
The emerging Local Plan has been a very long time in the making, since before Covid in fact, and life has changed significantly over the years. We draw your attention to the Pembury Parish Council letter to TWBC Planning Department of 15<sup>th</sup> November 2019 giving a fundamental objection which still stands.

It is, therefore, essential that there is proper local collaboration between TWBC, Pembury Parish Council and the residents of Pembury so that a

consensus can be agreed as to how all three developments of P1, P2 and P3 can be achieved without destroying Pembury and its village atmosphere. The Pembury Society does, reluctantly, still accept that these three sites might be a basis for some development, but we feel that the present course of action is not the right way to achieve this.

#### **4 The P2 Application**

In relation to this P2 Application, you will be aware that Cllr David Hayward (Borough Councillor) is on record for saying that this application is a work of fiction. We would concur with this as this was our initial reaction to some of the supporting documents.

Our initial thoughts led us to think that Obsidian may have ticked all the required boxes but have failed to give the application much thought. They have clearly used old maps and data and have not checked for updates. It is also apparent that they have not proof read their submissions. This is particularly true of the Heritage statement that was commissioned from an 'expert' but which contains a significant number of 'typos' and errors that would be obvious to anyone with even a limited knowledge of Pembury. All the supporting documents seem to have been produced as 'table top' exercises since they clearly show little or no understanding of the local situation either geographical or the expectations of the residents.

We are aware that Obsidian's interest in this application only stretches as far as getting outline permission so that they can then offload the site to a developer/builder who will make an application for what would actually be built. We also get the sense that, because the land is scheduled in the emerging Local Plan to be allocated for housing, they have assumed that getting planning permission is only a formality, so attention to detail is unnecessary. This could not be further from the truth, even for outline permission.

#### **5 Infrastructure**

The issues of necessary infrastructure have been outlined in both the Parish Council correspondence and ours, as well as the numerous letters of objection by the residents of Pembury. There must be an acknowledgement that all of Pembury's infrastructure is already at capacity or more and must be upgraded before any more development is allowed. This includes all the utilities but especially the sewerage system, the wider road network, bus services, schools, medical provision and flood relief.

We feel that none of these issues have been adequately addressed in the current application and, therefore, we contend that it should be refused and the developer return, literally, to the drawing board.

As stated above, traffic flow and parking issues have become a serious and urgent problem within Pembury, even without 300 more houses, and the

Pembury Society feel very strongly that now is the time to get things sorted out once and for all. There are just too many vehicles but there is no realistic way of reducing their number and impact, and therefore the situation will just get worse if more houses are added. In our view with all the new houses being built in Paddock Wood and the Pembury side of Tunbridge Wells it is only a matter of time before the Pembury Road and surrounds become totally gridlocked. The time has come for the authorities to stop burying their head in the sand and act.

The other traffic issues include:

Pembury has a population of about 6500 people, and there is no public car park in the village. Many houses along Hastings Road, and in the vicinity of P2 do not have driveways or off-street parking and Hastings Road becomes the only option for parking. We would remind you that the one car park we did have at The Camden on The Green was lost due to the oversight of TWBC not renewing the lease.

In order to keep the highway clear the majority of parking along Hastings Road in the vicinity of the P2 development sees vehicles parked overlapping the pavement, such that the pavement is no longer useable for pedestrians. Therefore there needs to be further provision for public car parks.

## **6 Focus on the P2 Application road proposal**

This one Application has included a complete new road layout proposal in order to facilitate these 99 new dwellings, extending from Hastings Road, through the Upper Green area and along the High Street. We challenge the assumption that the private spaces provided on site are adequate. Also the public spaces along Hastings Road would be most seriously compromised by the proposed traffic calming, chicanes, new crossings and double yellow lines. It appears that the authors of this proposal were not even aware that the Lower Green/Chalket Lane junction has traffic lights, so one questions how much they had walked the area at all times of the day and week, noting the heavy traffic trying to pass along the effective one-way sections of Hastings Road. At peak times much traffic does not arise from within Pembury, but is through traffic to/from the A21 in both directions.

How can it be that to justify 99 dwellings the whole of Pembury's main thoroughfare has to be changed? What will two further Applications bring with yet more traffic and road layout demands?

The staggered crossroad created by the site access and Belfield Rd with Hastings Rd will be very dangerous and confusing, particularly in rush hour. It would be very similar to the junctions of Chalket Lane and Lower Green Road with the High Street. That junction is at least controlled by traffic lights so there is no need to compete with the traffic on the main road. However, there is often still confusion over who has the right of way into the High Street from

either direction as most people turn towards Woodsgate from both Lower Green Road and Chalket Lane.

**7 A wanting Application**

It is obvious that old maps have been used as more recent details, such as the crossing outside the chemist that has been there for years and the relatively recent relocation of the PO and the traffic lights are missing. We believe that such lack of attention to detail invalidates the whole document. We would point out that this corresponds to the erroneous assertion elsewhere in the supporting documents that the PO is still on the corner of Belfield Road.

We would also like to point out that from the comments that have been submitted, we are not the only people who have found the application wanting with regard to facts and figures. Many of the specialist consultees have indicated that the information within their particular area of expertise is incomplete, examples of which are indicated below:

- a. KCC Flood and Water Management - To quote, *'Unless additional information is submitted .... we would recommend the application is not progressed at present.'*
- b. Upper Medway Internal Drainage Board - To quote, *'Although no consent is currently required from the Board, officers have noted a potential for conflict between the planning process and the Board's regulatory regime. The potential conflict is detailed...'*
- c. Southern Water - They need more time to consider the application as it consists of more than 50 dwellings.
- d. KCC Heritage Conservation - To quote, *'This HS [Heritage Statement by Savills] does provide a broad description of the archaeological potential of this site but unfortunately does not provide much assessment at all of Hubbles Farm. So it is not clear if historic buildings still survive on the site and if so what is their significance. In view of the archaeological potential I recommend the following conditions are placed on any forthcoming consent: ....'*
- e. Kent Fire & Rescue Service - To quote, *'Access onto the site is shown to be provided by a singular point. It is advised that a secondary point is provided and/or a suitable emergency access point onto the site which can be secured. The early consideration of an appropriate firefighting water supply for the development should be established.'*

**8 We therefore OBJECT to the Application and IT SHOULD BE REFUSED.**

**9 A way forward - we suggest that:**

- a. All Sites P1, P2 and P3 need to be planned as one for the sake of long term good planning for Pembury.
- b. Public parking sites need to be integral to the planning of the 3 sites to take parked vehicles off the main through roads of Hastings Road and the

High Street, also enabling the correct usage of the cycle lane in the High Street, which at present is useless with so many parked cars.

- c. We would like the housing proposed to meet the needs of Pembury residents where that is possible, especially at real affordable levels, to accommodate those starting on their first home. We support the analysis of the affordable housing mix provided by TWBC Housing Department and their emphasis on providing accommodation for local people.
- d. We agree to the setting aside of space for an extended cemetery, and suggest that the cricket field could also be extended, should the Club wish to do this.

Yours faithfully

Mrs Kathryn Franklin  
Planning Officer  
The Pembury Society