



Ditton Parish Council

TM/24/00372/PA

Please see below Ditton Parish Council's initial objections to this application. Please note this document is the initial response in order to register the Council's objections within the very short deadline given. Ditton Parish Council is continuing with requests for information but due to the time required for other organisations to respond, we are unable to include more at this time and trust that when we do provide this information it will be given the weight it deserves.

Ditton Parish Council held a public meeting for local people and over 240 attended, demonstrating there is a great public interest in this application.

Summary

Ditton Parish Council (DPC) strongly objects to the planning application, as specified, in the following areas of concern:

1. Loss of Privacy
2. Overshadowing and Overlooking
3. Adequacy of parking
4. Highway safety
5. Traffic Generation
6. Noise Dust and Air Pollution
7. Impact on Conservation Area(s)
8. Facilities
9. Intrusion into the countryside
10. Public Rights of Way (PRoWs)
11. Archaeology
12. Tree Protection Order / Species Protection
13. Water Usage and Sewage
14. Hazardous Waste and Contaminated Ground

The council's objections are described in more detail below.

1 Loss of Privacy

DPC is concerned that the development of Orchard Gate¹ in Ditton (developed in 2010 – 2012) will be subject to a significant loss of privacy from the proposed development on three sides. When the development was considered (and approved) Ditton Parish Council asked questions about future development and was assured that there were no plans to further develop on that (the East) side of Kilnbarn Road. This loss of privacy is a detrimental effect on people living in properties which were considered to be at a premium rural location with no overlooking properties.

DPC strongly believes that residents of Orchard Gate will face considerable additional traffic from this development and these small Cul-de-sacs will be enveloped and absorbed within a large estate, which was not expected in the original design, to the detriment of the existing residents.

¹ Franklin Kidd Lane and Cyril West Lane

2 Overshadowing and Overlooking

Ditton Parish Council believe that properties in Orchard Gate will face being overlooked by three sides of the proposed development. The design of this estate never factored being overlooked and despite gaps planned for, we believe that the houses will be overlooked to a detrimental effect to those already living in this area.

3 Adequacy of Parking

Ditton Parish Council has little confidence in the analysis completed by Tonbridge and Malling Borough Council and Kent County Council on the parking solutions being proposed. Historical evidence of the past twenty years has shown these analyses have consistently facilitated the delivery of poorly designed road and parking schemes including: Brampton Fields, Ditton; Holborough Lakes, Snodland; and Leybourne Chase, West Malling; which have all delivered inadequate parking and consequential traffic problems.

DPC believes that the current development's plan fails to include a realistic number of cars/vans per household. Further, the plan does not include sufficient opportunities to park cars/vans off the road.

DPC believes, having read the travel plans and the detailed reports, that there has been no serious consideration of the additional traffic essential for servicing the new development. For example, the development will be a major attractor for traffic arising from: supermarket deliveries; take-away food deliveries; on-line retailers such as Amazon; as well as traditional services such as: Royal Mail, Milk deliveries, etc. These delivery vehicles will need to park, albeit temporarily, on the development throughout the day as well as during the evenings and early mornings when the residents are at home, and the residents' vehicles are parked on the development. DPC do not believe that the accommodation of realistic quantities of delivery vehicles has been accurately reflected in the modelled simulations and consequent design.

Ditton Parish Council, again from experience, are aware that a proposed school will result in significantly more traffic than predicted. The primary driver for traffic arises because staff do not live within a walkable distance, which is exacerbated by the teacher shortages faced by Kent schools. There is also no submitted proposed travel plan which is expected from schools. DPC is aware from experience of Ditton Infant School, Ditton Junior School, Valley Invicta at Aylesford, Aylesford School, Malling School and Wrotham School that there is a lot of vehicle traffic on drop off and pick up. This includes traffic arising from those living in "walkable" areas – including estates (such as at Kings Hill). The proposal does not include adequate parking provision for this foreseeable demand

4 Highway Safety

The current proposed design has allowed for a new B Road to be formed, linking Kilnarn Road to the A20 through this planned development via the "Poppies" development, under construction, to the East of Hermitage Lane. This new B road joins the A20 at the A20 Poppy Fields (aka 20/20) roundabout and provides a new alternative route which will be available for people to use instead of the A20. The traffic modelling shows that this will result in an increase of traffic in Ditton on Kilnarn Road, thence New Road Ditton neither of which were designed for these increased levels of traffic, on top of that which would be expected from the development itself. This greatly increased traffic will increase the risk of accidents and collisions between vehicles, vehicles and two-wheeled vehicles and pedestrians including the cohorts of children attending the schools accessed from New Road, Ditton.

A further accident hazard will accrue from traffic heading South along Kilnbarn Road to access Red Hill (and the A26 at Watingbury) via Easterfields and Sweets Lane. These roads form a continuous single-track lane with high hedges and passing places over much of its length, and two blind bends, one at the junction with Rocks Road.

DPC specifically noted that the traffic modelling significantly underestimated² the existing peak traffic on this well-used route, as shown in Figure 1 below.

		To			
		A - New Link Road E	B - Kiln Barn Road S	C - New Link Road W	D - Kiln Barn Road N
From	A - New Link Road E	0	0	0	211
	B - Kiln Barn Road S	0	0	0	15
	C - New Link Road W	0	0	0	0
	D - Kiln Barn Road N	51	10	0	0

Figure 1 AM Peak traffic assumption, reproduced from Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf

The developers proposed new junction arrangement³ will add delays to this route (in both directions) as the traffic exiting the development to head North will have priority over the extant and well-used North-South route. This change in priority is likely to increase the number of vehicle collisions at this junction.

The plans to prohibit vehicles from the new development from turning South at this junction, whilst allowing the existing North South traffic to flow, by signage only is unlikely to succeed. The North-South route is already very busy in the morning and evening rush-hours and any additional traffic will disproportionately increase the probability of head-on accidents.

Whilst Ditton Parish Council approve in principle of the increase in footpaths and cycle lanes, we notice that the proposal does not guaranteeing the funding to complete the work. DPC is aware of the promises linked to Brampton Fields and dedicated funding for a purpose-built entrance. We are also aware that the funding from the Orchard Gate development for the proposed footpaths from that site to the extant paths in Ditton never materialised either. We are therefore objecting to the plans on the grounds that there exists no hypothecated funding, which the council believes is imperative to reduce pedestrian/vehicle and two-wheeler/vehicle collisions and deliver these road safety measures on Kiln Barn Road.

Ditton Parish Council expects an increase of accidents due to the planned reduction in width of Kilnbarn Road/New Road at the approach to Ragstone Court⁴ due to cycle lanes. The road being proposed is not designed to be widened; but vehicles encountering cycles coupled with narrowness could result in higher rate of accidents occurring. The enhanced hazard to cyclists by narrowing the road continues onto the start of New Road, Ditton^{5,6,7,8}.

² Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf; Sheet 443
³ Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf; 22-031-R1005 Rev A March 2024 p352
⁴ Transport_Assessment_Vol_3_-_Development_Vision_and_Proposals.pdf; Drawing 22-031/109; sheet 32.
⁵Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; Drawing 22-031/109
⁶ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; Drawing 22-031/110
⁷ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; Drawing 22-031/111
⁸ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; Drawing 22-031/112

Ditton Parish Council is concerned that the development is between two railway stations which are not main stations with regular services both ways (see section 5.2). This promotion of green travel and consequent reduction in road traffic, is not in line with the current offering in the area.

5 Traffic Generation

Having reviewed the traffic analysis, DPC is concerned that there are false assumptions and many material errors. DPC have also found typographical errors indicating that the supporting reports have not being suitably checked, particularly with respect to cross-references⁹.

DPC is concerned that the analysis shows small, unsuitable roads (such as St Peters Road and Bradbourne Lane) holding large numbers of queueing cars diverted from the more direct route of: New Road, Ditton. St Peters Road and Bradbourne Lane are residential roads with a mandatory width restriction, which do not support the free passage of vehicles due to the residents' parked cars; and are already subject to congestion during the morning and afternoon peaks.

DPC is concerned that the proposed design drawings of Kilnbarn Road/Link Road junction do not appear to correspond to the stated modelling assumptions. The analysis suggests that no access will be possible from the new link roads onto Kilnbarn Road South, but this is not supported by the drawing¹⁰.

Further, the traffic analysis of Kilnbarn Road only considers a peak of 10 Passenger Car Units (PCU) per hour for traffic travelling South and 15 PCU / hour peak heading North¹¹, at morning peak. This route already carries far more PCU than this. Indeed, other studies on the TMBC planning portal have indicated that a development of only 50 homes¹² exiting onto Kiln Barn Road further North than this proposed development, will generate an additional North-South Traffic flow of more than 10 PCU on this route.

DPC would ask reference be given to two surveys carried out locally to give actual figures of the number of vehicles using the routes of particular concern:-

Firstly the objection submitted by Mr R Wareham on 16th April 2024 between 6.00am – 9.30am. Mr Wareham surveyed traffic on Easterfields which leads to Sweets Lane and Rocks Road and counted a total of 153 road users, the data in the application estimates the road users to only be 25 so this is far below the actual number using this road now, without further development.

Secondly the objection submitted by Mr G Roach on 16th April 2024. Mr Roach surveyed traffic on New Road, Ditton. Again this actual current data disputes the lower figures suggested in the data submitted by the applicant.

⁹ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; sheet 91

¹⁰ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; Drawing 22-031/104

¹¹ Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf; page 443

¹² TMBC Planning Application 23/03298; Traffic analysis for the initial tranche of 50 homes at Ditton Edge predicted that approximately 18 PCU would use this route, in addition to the existing traffic flows.

5.1 Road Traffic

DPC is concerned, from inspection of the analysis methodology supplied, that the predictions of traffic expected as a result of this development may be an underestimate. Even so, the predicted traffic flows result in junction saturation, leading to increased congestion (See Annexes A and B).

DPC see within the traffic prediction model a reliance of unsuitable roads such as St Peters Road, which feeds into Bradbourne Lane, both of which are not wide enough to reflect the increase of traffic; and which regularly have parked vehicles along their length. Bradbourne Lane also has a 6'6" width restriction and a blind brow, with no footpath at that point. We are also aware of poor pedestrian visibility on Bradbourne lane, particularly from the new footpath added to accommodate the new Lidl store; and the egress from the public footpath onto Bradbourne Lane.

Ditton Parish Council note the KCC Modelling Advisory Service large-scale model¹³ significantly underestimates the traffic to and from East Malling¹⁴ (over 20% in some cases). There have not been and there are no known future plans to deal with traffic generated from this development, under scenario 3, adding to the already saturated flow through East Malling village centre. DPC accepts the developer's findings¹⁵ that the access road from Kiln Barn Lane to New Road, East Malling will: offer no additional support to East Malling traffic; will not work due to saturation of the village roads; and is not a plausible viable option.

Ditton Parish Council find the projected increase of traffic on Kiln Barn Road at 811% to be completely unacceptable. DPC also noted that the traffic generated from the 300 property housing development at Ditton Edge already being built, that discharges traffic solely onto that road had not been identified in the analysis. DPC is concerned that the projected increase is actually an underestimate.

Ditton Parish Council find the increase traffic of St Peters Road, a residential road to be unacceptable – and the suggestions that the project will encourage rat runs to avoid large chunks of the a20.

Ditton Parish Council is concerned that the plans for improving the A20 have not been completed and there are currently no proposed plans in place to complete the works that were originally promised.

Ditton Parish Council is concerned about the Hermitage Lane developments which have also not been considered in the analysis. Hermitage Lane has experienced large traffic problems for the last few years which the traffic analysis has not considered. The road is the main route for Ditton's residents to Maidstone Hospital. DPC is aware of delays to emergency ambulances travelling on this road, even when showing blue lights and sounding their sirens.

The proposal shows that traffic from the development is linking up to existing plans for a roundabout for a new development to the East of Hermitage Lane. This surely admits that the

¹³ Kent County Council Advisory Service; Maidstone Local Plan – Local Base Model Validation Report; prepared by Messrs Jacobs UK Ltd; project BESP0030; 23 April 2021.

¹⁴ Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf; 22-031-R1005 Rev A March 2024 sheets 272-277

¹⁵ Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf; sheets 430 – 433 inclusive

traffic issues from the housing developments is accepted by Kent County Council and Tonbridge and Malling Borough Council.

DPC is aware that there are plans to improve the J5 and J6 of the M20 to improve traffic flow. These improvements will be short lived due to the additional housing already under construction that will result in the capacity being filled in again.

5.2 Mitigation - Trains

The current proposals for reducing road traffic over the medium to long term includes the utterly implausible suggestion that the local train operator, SE Trains Ltd, double the number of services, at peak times, that stop at Barming station:

The station [Barming] currently operates a half-hourly service in both directions during peak periods and hourly off-peak. For the purposes of this TA, it is envisaged that, as a minimum, the peak hour services will be increased to every 15 minutes to cater for additional demand derived from the development.¹⁶

This is such an improbable suggestion that the inclusion of this statement further reinforces the view that the transport assessment modelling is flawed.

5.3 Mitigation - Buses

The current proposals discuss the ability of new and enhanced bus routes to reduce traffic generation from the development.

The specific [bus] routes and service frequencies will be determined by KCC at the appropriate time, however, for the purposes of this TA it has been reasonably assumed that there will be an increase in peak hour services which will provide increased opportunities for travel by bus between the site and surrounding key employment and/or education hubs. In particular, it is anticipated that service provision to/from Maidstone, Kings Hill and along the A20 corridor will be markedly improved¹⁷.

These plans are reliant on private enterprises being able to justify a new commercial route or additional services. The commercial justification for new routes, or greater frequency of services, to serve this development is implausible, and it would need to be subsidised. Funding from other sources, in part or fully is not credible in the medium to long term.

KCC submitted their Bus Service Improvement Plan with a bid for £213m; but were actually granted £35.1m¹⁸. The consequence of this was a county-wide reduction in bus services and routes particularly for school users, some being cut completely. Examples include Aylesford School and Wrotham School who have both experienced bus restrictions. DPC is also aware that some Parish Councils are now subsidising routes for areas such as Ightham, Trottscliffe, and Offham.

6 Noise, Dust, and Air Pollution

DPC is aware of evidence seen by Tonbridge and Malling Borough Council over the past 20 years that Ditton Corner (Junction between New Road/A20/Station Road) was one of the most

¹⁶ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; document reference 22-031-R1004 Rev A; March 2024 p37 (sheet 40).

¹⁷ Transport_Assessment_Vol_4_-_Sustainable_Travel_Strategy.pdf; document reference 22-031-R1004 Rev A; March 2024.

¹⁸ KCC Highways Parish Seminar Presentation.pdf; 2023.

polluted areas in Kent. We are also aware that all monitoring units were removed over the past ten years which means up to date data are not available to support or argue against any plans on the grounds of measured pollution levels.

DPC is aware of housing developments such as those on Kiln Barn Road which are in compliance with noise and dust levels. We are however constantly aware of the levels being not acceptable to those that are living close to the developments, with dust being a persistent nuisance in the summer months.

DPC is concerned that airborne pollution and in particular dust¹⁹ will have an adverse effect on the broad leaved plants within the Ditton Quarry Local Nature Reserve (LNR), which lies to the north of the proposed development.

Noise of the construction was graded as a 'major' impact to local residents in the environmental study²⁰ and contradicts the low concerns that reports highlight. This may be intolerable to residents of Orchard Gate.

Ditton Parish Council note the Defra Damage cost calculation tool with the calculations suggesting £376,100²¹. As the cost of mitigation will be higher than this figure – no mitigation is expected. This is unacceptable to the residents that will be affected from this.

We are concerned that light pollution will affect a known dark-sky area used for star gazing due to the lack of artificial lighting. DPC noted that the checks on sky glow were done on a cloudy night and the observers would have been unable to note the value this area has.

7 Impact on Conservational Area(s)

An associated planning permission application²² The plan is to demolish parts of the brick wall on the East side of New Road, East Malling. This wall is part of the curtilage associated with the Grade one listed building that is on the estate. This junction widening forms part of the junction of the access road with New Road, East Malling.

The planned road safety improvements in New Road, Ditton would require changes of use and groundworks on land that does not belong to Tonbridge and Malling Borough Council or East Malling Research. This land has protected village green status, lies within the Ditton Conservation Area, and could not be used for cycle lanes.

8 Facilities

Ditton Parish Council contest the view of Kent County Council assessment that another primary school is required. The recent educational reviews suggest the fall in PAN numbers will continue. Schools such as St Katherines have shut a third of available classrooms over the past few years.

The reports highlight that local doctors are still able to take patients. We believe this is linked to an increase of patient per doctor ratio that has been allowed by the NHS. DPC is also aware

¹⁹ ES_Vol_1_Chapter_8_Aur_Quality.pdf;

²⁰ ES_Vol_3_NTS_-_East_Malling.pdf; page 29 (sheet 32)

²¹ ES_Vol_1_Chapter_8_Aur_Quality.pdf; sheet 57 (page 143-144)

²² 24/00392/PA

that St Peters Village and Leybourne Chase provisions for GP surgeries have not been taken up. There is therefore a shortfall of GP provision in this area.

DPC is concerned that the inclusion of shops / restaurants will act as an attractor to traffic, and increase traffic flows into and out of the development. This is potentially worse if it increases the number of local take-away options. DPC have noted the detrimental effect on litter from existing facilities such as McDonalds; and these takeaways have generated additional traffic from delivery drivers. DPC is also aware of issues such as increased traffic heading to and from popular restaurants such as Papas’ Barn following their rebuild in the past 15 years.

9 Intrusion into the countryside

This development represents a Change in Landscape Character at the local scale from horticulture and orchards to an urban area.

Recently the Area 3 section of the borough has seen considerable housing developments, occurring at a faster rate, than the other two areas of the borough. This development plan is counter to the existing aims and philosophy of Tonbridge and Malling Borough Council cabinet for all the borough to share housing.

Further, this development plan if implemented would allow a tenth of all planned housing for TMBC to land within a single Parish Council.

Loss of Good Quality Agricultural Land

This development is contrary to TMBC Sustainability Assessment Objective 9: (To conserve and enhance soil resources and guard against land contamination)

The developer’s Agricultural Land Quality assessment confirms that this development would result in the loss of 62.3ha of “Very Good” (Grade 2) and “Good” (Grade 3a) quality arable land.

Table 1: Areas occupied by the different land grades.

<i>Grade/subgrade</i>	<i>Area (ha)</i>	<i>% of the land</i>
Grade 2	51.9	81
Subgrade 3a	10.4	16
Non-agricultural	1.6	3
Total	63.9	100

Grades defined in: Ministry of Agriculture, Fisheries and Food Agricultural Land Classification of England and Wales

10 Public Rights of Way

The development plans will have a major adverse impact upon the amenity value provided by the existing public rights of way. The current Public Rights of Way allow residents to have pleasant views across agricultural farmland and horticultural fruit production.

The developer has identified this loss of amenity:

*In the short term it is judged that for those PRow that cross the main site east of Kiln Barn Road there would be a **major adverse impact** upon the amenity value associated with these PRow first as a result of the construction activity and then in the medium term by the permanent altering of the views from these sections of PRow which currently experience pleasant views across open agricultural farmland and horticultural fruit production.²³*

The impact of this development would be to downgrade these pleasant views to a largely urban landscape.

Further, The PRowS crossing the development are some of the very few places locally where light pollution is low enough to see the stars of the night sky, and our own galaxy, the Milky Way. DPC note that these PRowS permit public access to an “intrinsically dark landscape”²⁴ that supports habitats for native nocturnal animals and permits visibility of the stars. Intrinsically dark landscapes are those entirely, or largely, uninterrupted by artificial light and which require protection from light pollution; and where any new lighting would be conspicuously out of keeping with existing local nocturnal light levels.

This amenity would not have been detected by the developer as they undertook their study on a cloudy night! DPC believe that this dark sky area is a valuable amenity that is highly valued to those who go out on clear nights to see the stars.

DPC believes that the light pollution arising from this development is contrary to national, planning policy, and government circulars²⁵, will be harmful to native nocturnal wildlife, and will prevent enjoyment of the night sky.

11 Archaeology

Ditton Parish Council objects to this proposal because of the risk of damage to archaeological sites that within the development boundary. This is also recognised by the developers:

The Proposed Development lies in an area of archaeological potential, especially for the Palaeolithic and Bronze Age periods within the Main Site and the Romano-British period in the Access Site. Foundations and other groundworks in this area have the potential to disturb and destroy archaeological heritage assets; destruction of a high significance receptor constitutes a long-term, substantial adverse effect.²⁶

²³ Environmental Statement Addendum: Volume 1, Main Text Chapter 19 – Conclusions; p743

²⁴ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, Guidance, Light pollution; Paragraph: 001 Reference ID: 31-001-20191101; 1 November 2019.

²⁵ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, Guidance, Light pollution; Paragraph: 001 Reference ID: 31-001-20191101; 1 November 2019.

²⁶ Environmental Statement Addendum: Volume 1, Main Text Chapter 15 – Archaeology and Heritage, pages 610 - 615

DPC is aware of the remains of the Roman Villa adjacent to St James the Great church near the Access site.

Lidar imagery of the Main Site, and satellite imagery (especially from 2003), suggests there may be a prehistoric (Bronze Age) ring ditch or round barrow within the site boundary to the immediate west of Dog Kennel Wood.

The development site has been largely unchanged for centuries a fact that is accepted by the developers:

The general setting of the Main Site is within an unlisted historic landscape relating to post-medieval woodland and agriculture. The landscape and the changes to it over time, provide historic information, and should be conserved.²⁷

The developers propose “sensitive lighting”, including the use of low glare fixtures, appropriate positioning, appropriate brightness and consideration to the orientation and optical qualities of the beam, will minimise the effect of the illumination of the Access Site on nearby Listed Buildings in the Conservation Area and on designated views of the historic landscape.

12 Tree Protection Order / Species Protection

DPC is concerned about the effect on the ancient woodland. The proposed 15-meter gap might still result in damage to a historical woodland.

Ditton Parish Council note there are there are several trees, group of trees and woodlands on the site which are the subject of a Tree Preservation Order. The TMBC Order References are as follows:

- Woodland TPO 80/10069/TPO dated 7/3/1980.
- Area TPO 76/10068/TPO dated 14/4/1977.
- Various TPO 86/10051/TPO dated 22/5/1986.
- Individual TPO 72/10084/TPO dated 10/5/1972.

DPC is concerned that the development will cause the destruction of many trees including five mature pendulate oak trees²⁸ One of these is a tree of high quality with an estimated remaining life expectancy of at least 40 years; while the other four are trees of moderate quality with an estimated remaining life expectancy of at least 20 years, in their current condition. Mature oak trees are recognised as a haven for 2,300 wildlife species, providing vital spaces to eat, shelter and breed; and their loss to the local wildlife will be significant. Replacement planting of young oak trees will not provide significant mitigation over the short to medium term.

There is one confirmed and 3 other trees that have the potential to be homes for Bat species; and DPC is aware that two properties on the development due to be demolished are also currently housing for bats.

The reports confirm there are eight species of bat currently living on the site that would be adversely affected by the planned development. The reports also highlight three active badger

²⁷ Environmental Statement Addendum: Volume 1, Main Text Chapter 15 – Archaeology and Heritage, p550

²⁸ Arboricultural Impact Assessment; Messrs SEED Arboriculture Ltd; SEED Ref 1446-AIA-V1-B; 8 March 2024; page 14

sets and a range of other animals living on the site including dormice, deer, fox, hedgehogs, stag beetles, and a variety of birds.

There is the potential for adverse impacts due to damage to habitat and the loss of certain animals during the clearance works²⁹. Long term effects include the introduction of stray light and glare onto bat foraging sites and corridors, as a result of lighting.

The developer has recognised the impact of this development on habitats of principal importance within the site boundary as follows:

.....there are some Habitats of Principal Importance (HPIs), which are of ecological value. The Application Site provides foraging habitat and shelter for a range of common and protected species. In addition, part of the site is noted as Deciduous Woodlands HPI and Ancient and Semi-natural Woodland HPI. Temporary disturbance from the construction phase (such as increased noise, dust generation, lighting and increased human activity) could have an adverse impact on these habitats and there could be accidental damage from machinery³⁰,

DPC is concerned that this development will result will result in loss of wildlife habitat over the short to medium term, from which the native fauna will never recover.

The development is in an intrinsically dark landscape where any new lighting would be conspicuously out of keeping with local nocturnal light levels. DPC believes that the light pollution arising from this development is contrary to national, planning policy, and government circulars³¹, and will be harmful to native nocturnal wildlife.

13 Water Usage and Sewage

DPC is concerned on the levels of flooding that have occurred on the last few years including on the A20 and surrounding roads. The naturally permeable soakaway provided by the site will be lost if built upon.

DPC is concerned that there are no plans for additional reservoirs to cope with the increased demand from the new housing for potable water; and the now regular reliance on the cutting of water usage to meet the future requirements.

Ditton Parish Council is also aware that the sewage developments in Kent are not coping with the current demand and have seen regular and routine sewage leaks. To minimise risks to the public, the infrastructure to deal with domestic waste from this development must be in place before the buildings are occupied.

At present, while the Ditton Waste Water Treatment Works could potentially deal with the effluent from this development; the fundamental issue appears to be how this effluent actually gets to the water treatment plant. The developer implies³² that the existing 150mm foul sewer in Kilbarn Road together with the existing foul sewer in Hermitage Lane will successfully

²⁹ ES_Vol_1_Chapter_11_Ecology_and_Biodiversity.pdf pages

³⁰ Environmental Statement Addendum: Volume 1, Main Text Chapter 11 – Ecology & Biodiversity page 410

³¹ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, Guidance, Light pollution; Paragraph: 001 Reference ID: 31-001-20191101; 1 November 2019.

³² Flood_Risk_Assessment_(Including_Drainage_Strategies)_-_Complete_Report.pdf; ref 22-031-002 Rev A; March 2024; pages 13 and 34

accommodate the foul effluent from 1300 additional homes as well as all the other developments around Hermitage Lane. However, Southern Water have confirmed that

“there is currently inadequate capacity within the foul sewerage network to accommodate a foul flow ... for the above development”³³

And

“the proposed development would increase flows to the public sewerage system which may increase the risk of flooding to existing properties and land”.

DPC is concerned that infrastructure plans never consider the impact additional housing will have on their efficacy and no stakeholders are ever accountable for the issues arising.

14 Hazardous Waste and Contaminated Ground

DPC is concerned with regard to the chemicals that were sprayed on the land. Produce on the land was never for human consumption and we are concerned that previous developments on East Malling Land have shown concerns after planning permission was granted and the concerns of residents were not considered strongly at this stage.

DPC is concerned that previous research activities on the site could pose an enduring risk to human health in particular: agricultural research activities have left a potentially toxic legacy in the soil. It is important to note that the crops on site were not grown for human consumption; and these crops were subject to experimental treatments using pesticides, and herbicides. Limited research has revealed that the site was used for research using: organochlorides like DDT, Lindane and Dieldrin; Organophosphorus chemicals such as Azinphos-methyl. Many of the pesticides legally used are now banned because of effects on wildlife, fish and humans; however a risk persists because crops grown in resident's gardens for human consumption can take up and concentrate these chemicals

DPC is concerned that asbestos was almost universally used in the past to strengthen items such as plant pots, in particular, factory made plant pots cast out of asbestos, such as window boxes and big plant pots on commercial sites. There remains a credible risk that asbestos containing artifacts could be found on site posing a risk to residents and construction workers.

³³ Letter from Southern Water ref. DSA000016633 dated 31 October 2022. Included as sheets 673 – 674 of Flood_Risk_Assessment_(Including_Drainage_Strategies)_-_Complete_Report.pdf

Annex A Traffic Modelling Highlights

Reproduced from Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf sheets 615 to 636 etc.

Table 3.6: Coldharbour Roundabout Assessment Results

Arm/Movement	AM Peak		PM Peak	
	RFC	Queue (PCU)	RFC	Queue (PCU)
2037 Reference Case				
Coldharbour Lane	0.69	2.3	0.55	1.3
A20 London Road (East)	1.04	48.1	0.95	15
A20 London Road (West)	0.63	1.9	1.06	65.9
2037 With Dev Scenario 1 (Aspirational)				
Coldharbour Lane	0.69	2.3	0.57	1.4
A20 London Road (East)	0.98	22.9	0.92	10.8
A20 London Road (West)	0.68	2.3	1.05	57.7
2037 With Dev Scenario 2 (Moderate)				
Coldharbour Lane	0.69	2.4	0.57	1.4
A20 London Road (East)	1.1	86.4	0.93	11.4
A20 London Road (West)	0.66	2.1	1.05	60
2037 With Dev Scenario 3 (Pessimistic)				
Coldharbour Lane	0.72	2.7	0.59	1.5
A20 London Road (East)	1.04	55.5	0.97	20.1
A20 London Road (West)	0.72	2.8	1.08	77.8

Table 3.7: A20 / Hermitage Lane Assessment Results

Arm/Movement	AM Peak		PM Peak	
	DoS (%)	Queue (PCU)	DoS (%)	Queue (PCU)
2037 Reference Case				
A20 London Road (E)	106.8%	100.9	90.0%	14.6
Hermitage Lane	57.4%	6.9	60.8%	7.3
A20 London Road (W)	45.7%	7.9	75.7%	21
Preston Hall	10.0%	1.4	13.7%	1.9
A20 Reservoir (WB)	41.5%	18.7	30.4%	15.1
A20 Reservoir (EB)	72.0%	7.1	59.1%	8.7
2037 With Dev Scenario 1 (Aspirational)				
A20 London Road (E)	107.0%	103.1	103.40%	86.1
Hermitage Lane	64.2%	7.9	50.9%	6.4
A20 London Road (W)	44.2%	7.5	101.8%	47.3
Preston Hall	10.0%	1.4	9.7%	1.5
A20 Reservoir (WB)	39.5%	16.4	29.2%	1
A20 Reservoir (EB)	74.0%	7	74.6%	9.6
2037 With Dev Scenario 2 (Moderate)				
A20 London Road (E)	106.7%	100.6	104.6%	86.3
Hermitage Lane	68.3%	8.5	51.6%	6.5
A20 London Road (W)	43.8%	7.4	96.6%	34.9
Preston Hall	10.2%	1.4	9.7%	1.5
A20 Reservoir (WB)	42.6%	1.5	26.2%	14.5
A20 Reservoir (EB)	71.2%	7	74.8%	9.7
2037 With Dev Scenario 3 (Pessimistic)				
A20 London Road (E)	116.2%	164	121.1%	173.3
Hermitage Lane	72.1%	9.3	72.9%	9.9
A20 London Road (W)	44.2%	7.5	72.6%	18.5
Preston Hall	10.0%	1.4	13.1%	1.9
A20 Reservoir (WB)	39.8%	15.2	26.0%	12.7
A20 Reservoir (EB)	77.3%	7.6	69.4%	11.1

Table 3.8: A20 / Station Road / New Road Assessment Results

Arm/Movement	AM Peak		PM Peak	
	DoS (%)	Queue (PCU)	DoS (%)	Queue (PCU)
2037 Reference Case				
A20 London Road West	100.0%	34.8	104.1%	40.3
A20 London Road East	75.0%	15.5	101.2%	32.5
Station Road	95.6%	18.5	105.1%	62.9
New Road	96.0%	15	90.3%	9
2037 With Dev Scenario 1 (Aspirational)				
A20 London Road West	96.0%	29.2	104.5%	41.2
A20 London Road East	99.1%	13	94.4%	22.9
Station Road	102.7%	26.1	105.8%	67.9
New Road	98.5%	16.7	79.7%	6.7
2037 With Dev Scenario 2 (Moderate)				
A20 London Road West	95.4%	28.3	104.6%	41.3
A20 London Road East	92.3%	14.3	68.1%	12.2
Station Road	99.9%	21.7	105.7%	67.1
New Road	97.6%	16	80.8%	6.9
2037 With Dev Scenario 3 (Pessimistic)				
A20 London Road West	95.7%	28.3	98.7%	27.7
A20 London Road East	89.7%	12.4	96.5%	24.4
Station Road	94.6%	17.3	101.3%	48.2
New Road	97.2%	15.8	92.4%	9.7

Table 3.9: A20 / Bradbourne Lane Assessment Results

Arm/Movement	AM Peak		PM Peak	
	RFC	Queue (PCU)	RFC	Queue (PCU)
2037 Reference Case				
Bradbourne Lane	0.67	2	1.24	53
A20 (W)	0.62	1.6	0.68	2.1
2037 With Dev Scenario 1 (Aspirational)				
Bradbourne Lane	0.75	2.8	1.33	68
A20 (W)	0.68	2.1	0.77	3.5
2037 With Dev Scenario 2 (Moderate)				
Bradbourne Lane	0.76	2.9	1.33	67.9
A20 (W)	0.67	2.1	0.78	3.6
2037 With Dev Scenario 3 (Pessimistic)				
Bradbourne Lane	0.73	2.5	1.21	48.2
A20 (W)	0.57	1.3	0.66	1.9

Annex B East Malling Traffic

Reproduced from *Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf*

The highway network in East Malling village is constrained by the historic street pattern and the presence of on-street parking which restricts two-way vehicle movements on some sections.

C&A commissioned traffic surveys and carried out observations of traffic conditions in the village. As the driver behaviour here is influenced significantly by parked vehicles, C&A also monitored the usage of parking bays on High Street and Chapel Street over the morning and evening peak periods in five weekdays and noted how these influenced traffic conditions.

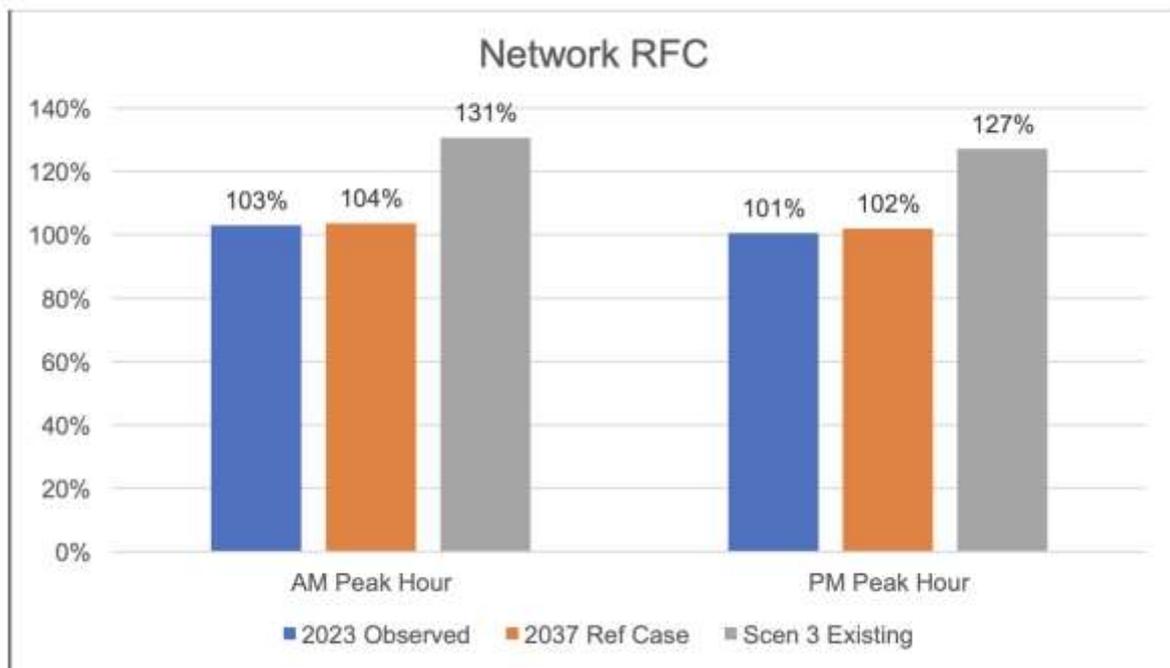


Figure 2 Reproduced from *Transport_Assessment_Vol_5_-_Multi_Modal_Assessment.pdf*

The Network RFC for the 2023 observed conditions is around 100% in both peaks - this indicates that the network is around capacity now, which correlates with site observations. The 2037 Reference Case flows show a similar level of Network RFC, just above 100%.

For Scenario 3 the Network RFC is significantly higher at around 130% - this indicates that around 30% of hourly demand would not progress through the village network within the peak hour.