

PEMBURY NEIGHBOURHOOD DEVELOPMENT PLAN - CONSULTATION

Response from the Pembury Society

12th July 2022

We have divided our response into three sections:

- 1 Key Issues that need prominence, policy and recommended solution(s) in the Plan,
 - 2 Points that we have picked up that we think may need a correction or explanation,
 - 3 The wider issues of road and traffic structures that need to be addressed by appropriate authorities together.
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Section 1 – Key issues that need to be given a bold statement and position in the Neighbourhood Development Plan (NDP), with policies and recommended solution(s), and not lost within the generality of the overall Plan. We note the laudable aims but there appears a lack of reality and recognition of “where we are now”:

1.1 Motor vehicle - ownership, home parking, speed in the village, electric charging, their future.

We believe that while policies use a direction towards walking, cycling and public transport as a matter of better health, fuel economy, etc yet the general public will not give up their motor cars. The current ownership of 51% of residents owning at least 2 cars is unlikely to reduce, and shows the dependence on the car as a mechanism of family life in Pembury.

Ownership - In this village there are many reasons why cars will continue to hold their own:

The gradients in our village roads

The distance between part of the village and our nearest national supermarket, hospital or garden centre

The distance of a key shopping area at North Farm requiring a car, not just for travel but for carrying things purchased

The carrying of children to/from non-local schools, especially for extra sport activities

The London commuters needing prompt access to stations

Means of travel to work places outside Pembury, which inevitably could mean at least two bus journeys each way or more

Both adults in a household work at different places or have different activities to respond to, requiring two cars

and many more.....

The consequence of this is that there have to be solutions that include the use of cars, and the knock-on consequences in terms of parking and electric charging.

Home parking is possible for many one car families, and some for two cars, while there is a significant number without any home off-road drive or garage.

Thus, there are areas of the village and roads which at times of the day have become giant car parks, with sometimes no alternative in the vicinity.

There is in addition a parking of a second car on the road to avoid blocking a drive.

For some there are no alternatives but to park on roads, and there will be an electric charging issues in the future.

(see NDP 9.13 – but **where is the allocation of spaces**, and Policy P14 B)

The consequence of this is that there should be extra allocated parking areas in the Plan with electric charging points, drawing cars off the public roads. Such areas with only on-road parking need to be identified and nearby parking areas created.

Speed in the village

Safety in the village for pedestrians, especially children, disabled and the elderly must be a priority. The reduction of required maximum speed to **20mph in villages** is now becoming much more acceptable, and this **should be adopted**.

Enforcement of speed limits is virtually nil, so further measures need to be adopted, such as speed limiters by design, or by speed humps (there being various designs which are not harmful to cars), chicanes in suitable places as are found in French villages, all of which in reducing speed also encourage the “rat runners” through the village to choose the A roads.

A reduction of speed to 20mph and changes to road design should be a priority.

1.2 Cycling, walking and public transport – usage, safety, access

All statutory policies seem to be driving everyone to think cycling, walking or using public transport.

This is taken as an assumption, and while the policy may be laudable, yet there are some very important considerations: (See also 1.1)

Pembury has a considerable gradient from north to south, which cannot be negotiated by everyone, and **a simple distance criteria is not sufficient**.

Cycling to a very large extent in rural Kent is largely recreational

Walking does not (largely) extend to weekly shopping for groceries, and for most other purchases, and in Pembury is very marginal in those activities, for example collecting plants and supplies from Notcutts always involves a car.

The key walkers are those taking dogs for walks, recreational walking, and taking children to Primary school in Pembury (although many use a car for taking children to/from the Primary School – note elsewhere distances around the village).

Public Transport is not a village responsibility, and services have been reducing not increasing, and they are not routed in all directions as required. The current policies for underpinning the bus service is in contrast against the policy for encouraging using public transport.

The consequences of this is that such policies in practice have limited appeal, and it is the provision of public transport with high frequency and flexible choices of destination that would make any in-road to meeting this policy. The provision or at least reinstatement of a proper bus service is an essential feature to achieve this. At present a car is a necessary requirement, and appropriate provisions need to be made for their use.

1.3 Roads and pavements – use of available space

Parking on pavements should be outlawed. In the majority of cases it brings no benefit to the road users as only one car can pass anyway, while the pavement is taken up preventing disabled wheelchairs, pushchairs and children from getting through. Tough approaches are taken for uncut hedges overflowing pavements, but nothing is done about cars.

Parking around the centre of the village should be limited to 2 hours only between 9am and 6pm so that users of the shops and other facilities can actually find a parking space and

detering those who travel elsewhere and who amalgamate their car sharing by leaving spare cars parked for the day. More spaces nearest the chemist should be allocated and limited to half hour parking only, to **include some spaces at the top of the Lower Green Road. (see NDP 9.11)**

Those who use **disabled wheelchairs** comment on the uneven pavements as well as lack of access points to pavements in some areas, and **a survey needs to be conducted** to remedy this. (see NDP 5.12 “the Parish Profile considers that the community is ageing”)

The consequences of these matters are a higher level of risk, to individuals and sectors of the community being disadvantaged. Simple changes to parking arrangements would make a substantial difference.

1.4 Infrastructure - The consequences of 10% + increase in population

Reference is made in NDP Section 12 but this only addresses the finances that might be available to the parish.

What needs to be addressed are the facilities and infrastructure that are impacted by the increase in population, (maybe 800 adults and up to 100 children) namely:

- School numbers

- Doctors' availability, size of lists

- Sewage/flooding issues

- Traffic issues around Woodsgate and into Tunbridge Wells. (See Section 3)

- etc

Section 2 – Points that we think might need correction or explanation (with reference to the Plan numbering)

- 2.8 Remove sub heading 1.2 (comes after 2.8)
- 2.11 A real mix of items
- 2.13 Last sentence does not fit with Rights of Way – remove to 2.14
- 3.2 Objectives
2 – the assets “enable” events, not the Plan to have a programme
4 – Waterways? Needs explanation – streams?
6 – Start-up units – where and how much land? New houses need study areas. See also NDP 7.4 and Policy P7)
- 4.5 Does not identify a housing figure – yet they are available elsewhere.
It appears **the NDP accepts without reserve the full housing allocation of TWBC draft Local Plan, yet does not say so. Is this acceptable to the village?**
There is **at least a 10% increase in village size, but infrastructure and facilities do not get sufficient mention or solutions.**
The PNP requires “no unacceptable strain on infrastructure capacity”. How is this identified or addressed.
Does the modelling arise from speaking to the local estate agents about demand/supply needs?
- The **site at the bottom of Church Road adjacent to Downingbury (AL PE4) should not have access to Church Road**, which already has a traffic problem. It should have access to Maidstone Road. (Policy P3,B,ix – see Appendix A)
- 6.8 Sub 3 “avoid fragmentation” needs explanation
Sub 5 “green system” needs explanation
Sub 11 has any archaeological site ever been enhanced? Do they need identifying?
- 6.20 A12 area or A21?
Problem of sewage/flooding areas are many in the village including Heskett Park, Ridgeway, School – at least. These need to be resolved before new housing puts further stresses on the systems.
- 6.21 Note planting suggested, but in reality hedges are removed (example Sturgeons site along Henwood Green Road and the allotments). Who is going to police the policy?
- 6.27 Actually by JMW Turner (see picture incorrectly at 6.28)
- 6.28 Not explained properly. Hops (to 1960’s) and bricks (to 1939) are not comparable in “terms of replacement”
- 6.29 More than “several”
- 6.30 14 identified are not necessarily exhaustive. These are potential.
Amberleaze spelling, It should be York House/Amberleaze (now split into two)

Figures 6.3

Map P35 no's 8 and 14 are the wrong way round
9 not labelled with number
Black dots or triangles? See key

6.36 The potential 14 – there may be more!

8.20 8 is the Burial Ground (nothing to do with Church) – also field reserved adjoining
12 and 13 wrong way round on map?
10 Old Church ground – ownership by the Parochial Church Council or Pembury Parish
Council?
Note Upper Green not mentioned, save 8.23

8.25 Sites of Special Scientific Interest (SSSI) - Is there really only one? Possible one in Stone
Court Lane?

P50 Picture of “orchard” looks like the Coach Road, not an orchard

P55
Figure 8.5 Additional view NE from FP WT214 towards the Hop Farm not mentioned (seen from Albans
Farm Cottages?)

9.5 “Highly” – only applies to certain ages and abilities – fitness dependent
No regard to gradients and safety. (see 1.2 above)
The **statement about mileage is just incorrect**. From Middlefeld to Tesco is 1.25 miles,
uphill all the way, and it takes at least 30 minutes to walk. People in Gimble Way or down
Maidstone Road or Romford Road are even further away.

9.7 Parking comment – what about visiting teams and equipment needed? **Not practical
without parking – needs more parking spaces**

Bridleways mentioned in various places – this also means cyclists will have access to those paths. More
care needed on recommendations. Horses will churn up the ground.

9.13 “several potential opportunities” – where?

Car parks - Only area highlighted is extended village hall car park. This completely misses
the alleviation of on-street parking and electric charging areas coupled with the need for
more double yellow lines in further areas. **Fundamental error of omission.**

Policy P14 B1 “alleviate” how is this supported?

B Non-Policy actions

Sub 11 – “one way westbound direction in Hastings Road” - just **not practical or thought
through**, for the residents in the Road, for eastward travelling along Henwood Green Road?
Should be deleted completely.

P83 We note site allocations – comprise 254/264 proposed units
Plus 224/264 care units
This may mean **approximately 800 added to population of Pembury**

Appendix C sub 1 “Hasting S”

4 and 5 **Hawkwell Cottages**, Maidstone Road. – not be confused with 4 and 5 Maidstone Road.

12 – Waterworks is an industrial building – not domestic (only the water!)

13 is York House/Amberleaze

Appendix F Hastings Road/Stannam Road twitten – the last right hand picture needs reversing as is wrong way round!

Section 3 – Road and traffic structures

While not a direct parish issue, yet there will be a considerable impact of the 3000+ dwellings on this side of Tunbridge Wells on the village of Pembury (Paddock Wood, Capel, Tudeley etc). Access of all these houses to Tunbridge Wells and westwards impacts on the Woodsgate crossroads, the Maidstone Road and the Pembury Road.

The Pembury Society has identified a solution that should be explored at County, Borough and Parish levels, as the existing problem of the Pembury Road is not capable of being alleviated in itself, and **it is essential to work towards a more sustainable approach through and around Tunbridge Wells.**

Full details are on the Pembury Society website, but in essence (and for the sake of Tunbridge Wells future as well as Pembury) **a ring road needs to be developed south of Tunbridge Wells**, joining up the A21, A22 Frant Road, A26 Crowborough Road, and through to the East Grinstead roads.

In addition, **a spur needs to be developed to link the Maidstone Road (Pembury Northern bypass) to the North Farm A21 interchange**, thus removing traffic from Woodsgate crossroads, which would also provide a direct link to the A21. **This should be a priority.**

See:

<https://www.pemburysociety.org/resources/The-Ultimate-Bypass-for-Tunbridge-Wells.pdf>