

## **TM/14/02992 41 houses A-Z Site Fairfield Rd, Borough Green**

Borough Green Parish Council objects to this application.

### **Summary of reasons**

1. Departure from the LDF
2. Departure from all recent Parish Plans and Character Area Appraisal
3. NPPF 12 Conflict with the Aims of the developing Local Plan
4. No justification in the Affordable Housing Needs or Strategic Market Housing reports
5. Unacceptable impact on Highway Safety, Traffic and Air Quality
6. Marketing has been at Housing Development Land Value of £3.5m per hectare, not as a prime commercial unit.

### **Detailed Analysis**

**1.** The TMBC Local Development Framework adopted in 2007 para 5.116 says " This is a good employment site that provides diversity to the range of employment available within Borough Green, it is classified as "Best Urban" and should therefore be protected".

The Site Appraisal Criteria table refers to it as a "modern unit", states- "Prudent use of natural resources" - "Sustainable location in close proximity to village centre" " provides jobs within the service sector which is a key objective for T&M".

Whilst we accept the property has been marketed without success for some time, at a guide price of £3.5m it is overpriced and unlikely to sell.

**2.** The 2005 BG Parish Action Plan, and the updated 2009 and 2011 Parish Plans all say:

- 8.1 "The site and premises in particular have been tailored to meet their (AZ) needs after the company took over the derelict site formerly occupied by Novellos Publishers. The buildings therefore incorporate parts that were already on site, together with new purpose-built accommodation (see picture above).
- 8.2 The company (A-Z) considers Borough Green a good location for its business operations given its close proximity to major motorways and railways. This allows it to distribute goods easily across the country."

**3.** The 2014 Supplementary Plan, produced specifically for inclusion as a material document in the current T&MBC Local Plan process says-

- "**A-Z Site** Whilst the owners of the site, the A-Z Trust, have ideas to develop the site as housing, the Parish Council would resist the loss of this important modern employment site, and agree with Planning Department that the consultant's figures demonstrating adequate employment land in the locality are badly flawed."

Referring to the loss of the Isles Quarry employment Area it goes on-

- "Since the steady decline of local sandpits and quarries, and their ongoing use as landfill sites, the employment base in the village has been badly eroded over the past couple of decades. Planning Policies that promote conversion of employment land to housing have added to that decline. We now find ourselves in a position where local employment is scarce, which has a major impact on local employment opportunities, and aggravates our traffic problems. There is a glimmer of hope that we may have reached a

tipping point that will prevent any further loss of employment land. **LDF CS Policy CP (2) & (3)** should safeguard existing employment sites."

**(4) LOCAL PLAN** - In a recent Local Plan Seminar, TMBC advised that whilst the Employment Land review showed adequate employment premises across the Borough, but that there was an imbalance between office and commercial, with a demonstrable lack of commercial premises.

## **(5) Traffic**

Whilst the developer attempts to make the case that traffic will be broadly similar with its use for housing, this is clearly not the case. The A-Z site has about 40 carpark spaces, as against the developers planned 89 cars, but what is more critical is that A-Z traffic used Fairfield Rd at different times to residential, the proposed new traffic will augment the existing traffic clash at the Wrotham Rd junction, aggravated by the Fairfield Gate parking on the road at the junction.

The estimated TRICS figures quoted show a greatly exaggerated level of trips for the previous commercial use, and whilst a new commercial use could well generate an increase in use, that use would be spread fairly evenly throughout the day, and not the two large residential groups of movements that would augment the existing residential use from Fairfield Estate and deliver significant increase in traffic at a dangerous junction in the rush hours.

The developer's assessment that the junction of Fairfield Rd and Wrotham Rd has "reasonable visibility" is wildly optimistic. Their pictures are taken from a standing position, not driver's eye height. From a driver's perspective the junction is completely unsighted in both directions until they have "nosed out" into Wrotham Rd, and this is aggravated by traffic leaving the village centre congestion speeding up as it passes Fairfield. This junction is directly opposite Bourne Industrial Estate, and only 85 mtrs from the Station Approach and Co-op store, and the proposed Sainsbury access.

**MDE DPD Policy SQ8 para 2** states quite clearly that "development that harms road safety will not be allowed", and in para 5 that "any significant effects on traffic must be identified, and mitigation is required to be provided before development will be allowed".

## **Air Quality.**

- 6.4.2 PPS23 and its Annex state that policies should seek to reduce the impacts from development on air quality. Core Policy CP1 requires all proposals for development to preserve and wherever possible enhance air quality.

LDF MDE-DPD Policy SQ4 is quite specific :

**Development will only be permitted where all of the following criteria are met:**

- **(a) the proposed use does not result in a significant deterioration of the air quality of the area, either individually or cumulatively with other proposals or existing uses in the vicinity;**

The cumulative effect on air quality from traffic generated by the residential use of the proposal must be considered alongside 171 houses at IQW, and all other local development.

## **Affordable Housing Needs.**

The Isles Quarry Development of 171 houses was predicated on the need for Affordable Housing in the local area, and that was the Exceptional Circumstances justifying release of MGB land. The sole justification for the market housing on the site was to pay for that affordable housing, not because there was a local need. Borough Green and Wrotham are already in the top 10 in T&M for affordable housing numbers per capita.

## **Market Housing Needs**

As the 2014 BG Supplementary Parish Plan quite clearly sets out, there is no need for further market housing in the area- "The requirements of the Strategic Market Housing Assessment <sup>(11)</sup> for the developing Local Plan shows a requirement of 650 houses per annum, a 1.4% increase across the Borough. As Isles Quarry increases BG's housing by 10%, plus other windfall development, our local housing needs are satisfied for the Plan period."

## **Conclusion**

This is a speculative development that does not accord with the Local Development Framework requirement to protect valuable employment land.

The affordable and market housing demand for the area has already been met for the Local Plan period by Isles Quarry and elsewhere.

The cumulative impact on the AQMA forbids further developments .