

DRAFT FOR CIRCULATION TO RESIDENTS — NOT FOR SUBMISSION

Planning Application TM/26/01252/FL — Land South of Church Lane, East Peckham

64 dwellings — Wealden Land Ltd

Collective Objection from Residents of East Peckham, Hale Street and the surrounding area

To: Development Management, Tonbridge and Malling Borough Council (FAO Susan Field, Principal Planning Officer)

Why we are writing

This is the second time in five years that this developer has asked to build on these fields. Residents objected in 2022 and 2024, in detail and in numbers, and on 10 October 2024 the Borough Council refused the previous scheme (TM/21/03353/FL) because it would harm the Green Belt, visibly merge our separate settlements, and push development out into the countryside.

The fields have not changed. The flooding has not changed. The roads, the buses and the distances to the shop have not changed. What has changed is the label on the application: five fewer houses, and a new claim that our Green Belt is now "grey belt". We do not accept that renaming the land changes what it is or what it does for our community.

The Parish Council has submitted a detailed technical objection. We support it in full. This letter is our own: it explains, as the people who actually live here, walk these lanes, drive these roads and bail out these floods, why this development is wrong.

And this time, we are not alone. Since the application was submitted, the Council's own expert advisers have reported back — and they share our concerns. In short:

- Kent County Council Highways — the county's own road authority — will not support the application as it stands. They say the traffic survey is out of date, there is no parking plan, and the developer's accident check (an out-of-date website) must be replaced with proper collision data.
- Kent County Council's flood team — the "Lead Local Flood Authority" — has recommended a "holding objection", telling the Council not to approve the drainage until the developer provides proper information.
- Kent Fire and Rescue Service says the emergency access for fire engines "[has] not yet been demonstrated".

- Paddock Wood Town Council — our neighbouring council — has formally objected, warning that our new residents would overload their already-stretched health centre and that the flood-risk "sequential test" has not been applied properly.
- NHS Kent and Medway confirms the development would pile pressure on local GP surgeries and is asking the developer for nearly £87,000 towards healthcare.

When residents, the Parish Council, the county highways authority, the county flood authority, the fire service and a neighbouring council are all raising the alarm, this is not a scheme that should be waved through.

1. This land keeps Hale Street and East Peckham separate

The development site sits in Hale Street, not East Peckham — the developer's own landscape assessment says the scheme "will be perceived as an extension [of] the settlement edge of Hale Street". Yet every shop, hall, school and service the developer says new residents will walk to is in East Peckham, on the other side of this open land. You cannot claim to be part of East Peckham for the brochure and part of Hale Street for the landscape report. Build here and the two places simply grow together — exactly the "visible merging of separate settlements" the Council refused in 2024. Once these fields are gone, the gap between our communities is gone for ever.

This is also working countryside: the whole site is Grade 2 "very good quality" farmland — the developer's own soil survey says so — in a parish whose identity was built on hop gardens and orchards. It is part of the last open, historic view along Church Lane, a lane of oast houses and listed buildings.

The developer tries to get around the Green Belt by calling this "grey belt". But the rules say land cannot be "grey belt" if flood risk gives a strong reason to restrict development — and this site, as we set out below, floods. The Council's own 2025 Green Belt study also rates this land as strongly performing. The label does not hold.

2. Flooding — we live with it; the paperwork does not

East Peckham is one of the most flood-affected villages in the Borough — over 800 of our roughly 1,400 properties are at risk. Many of us have stood in floodwater in our own homes and gardens. We know exactly how this valley behaves in a wet winter, and it is not how the consultants' reports describe it.

- The developer's flood plan says that in a flood, residents will evacuate along Church Lane. Church Lane itself floods — the Environment Agency's own records show it flooded from the rivers in 1960 and 1968, the developer's flood maps show most of it at risk from surface water today, and residents have recorded floodwater up to 900mm deep at the site

entrances. In 2013 the rivers and the surface water came up together. An escape route that is underwater is not an escape route.

- The ground testing behind the drainage plan was done in August 2020 — in one of the driest summers on record — and even then the water table was barely two metres down and two of the three test pits failed the standard test. The developer has now produced a fourth version of its drainage plan (August 2026), but it still leans on those same dry-summer tests, still cannot achieve the dry ground it needs, and still cannot even state consistently what the ground is made of (it says one thing on one page and the opposite on another). Six winters on, the wet-season testing everyone asked for has never been done.
- The site drains into the Coult Stream. The Coult already floods homes downstream — some of our gardens and walls form its banks. Adding the run-off from 64 houses, on a promise of "as close to greenfield rates as possible" with no actual number attached, puts our homes directly in the firing line. If permission is granted at all, the developer must be legally tied — through a binding Section 106 agreement — to build and forever maintain the drainage basin, silt traps and interceptors that are supposed to protect us, not leave it to a management company that may not last.

It is not just us saying the drainage is not good enough. Kent County Council's own flood experts reviewed it and recommended a "holding objection" — they want the discharge rate corrected, a broken calculations file resubmitted, and missing details supplied before the Council goes any further. The developer's revised plan has not answered them.

You may hear that "the Environment Agency has no objection". Please read the small print. The Agency only looked at the river-flood report; it left the big question — whether there are safer sites (the "sequential test") — to the Council; and it said in plain terms that evacuation arrangements, emergency plans and surface-water drainage are "not within our direct remit". In other words, its tick does not mean our flooding concerns have been checked. We ask the Council to challenge the Agency on how carefully it really looked, and to make its own decision on the sequential test, which nobody has passed. Even Kent Fire and Rescue says the emergency access for fire engines "has not yet been demonstrated".

We also notice what the application does not show. To keep these houses dry, their floors have to be built well above the flood level — up to about 1.5 metres above the existing ground at the lower, Hale Street end of the site. Yet the developer has provided no plan showing existing versus finished ground and floor levels. That missing drawing hides two things: houses sitting up on raised plinths, looming over a historic rural lane; and the risk that raising ground near the flood line simply pushes water onto the rest of us. On the last application, the same fields needed the ground raised and flood storage put back to compensate. The Council should insist on seeing the levels drawings before deciding anything.

When flooding comes, it is not the developer who responds. It is our three volunteer flood wardens, our neighbours, and the emergency services — on roads that are underwater. Putting

64 more households, including older residents in bungalows, behind a floodable lane is a risk this village will carry long after the developer has gone.

3. You cannot walk to anything from this site — and the developer knows it

The developer's brochure claims shops, restaurants and community halls are "within a 10 minute walk" of the site, drawn as circles on a satellite photo marked "not to scale". We invite the Case Officer to actually walk it, as we do:

- The real route to the Co-op is over a kilometre — about 15 minutes each way for a fit adult — along Church Lane, which is unlit and has a pavement on one side only. The alternative, via Hale Street and Old Road, is nearly two kilometres — over 20 minutes each way.
- For our older neighbours the picture is worse: at realistic walking speeds, the shop is a 23–35 minute walk each way for someone over 80 or using a walking aid. A quarter of this parish is over 65; 16% of us are disabled. This scheme includes bungalows and ground-floor flats aimed at exactly these residents — with not one home promised to accessible building standards, on pavements the Borough's own 2025 walking audit found are often less than 1.5m wide, parked over, and broken by pinch-points that force people into the road.
- The bus is roughly one an hour in the daytime, Monday to Saturday — with a gap of about three hours in the afternoon towards Maidstone, no buses in the evening, and none at all on Sundays. It is fine for the occasional trip, but no use for commuting or an evening out — for that you need a car.
- The nearest station, Beltring, has around 40 passengers a day for a reason: no car park, no lighting, no pavement on the approach roads, and to reach it on foot you must cross the A228 — a national-speed dual carriageway with no crossing. Four people died on that road at East Peckham in the last year. Yalding station has 21 parking spaces. Every "sustainable transport" claim in this application dissolves the moment you test it against reality.

Every household on this development will run a car — most will run two, as 56% of village households already do. That is not a lifestyle choice; it is what living here without services requires. This is the definition of an unsustainable location. Kent County Council Highways agree there is a problem: they have refused to support the application until the developer produces an up-to-date traffic survey, a proper parking plan, and real accident data — replacing the out-of-date website the developer relied on.

4. Cramped homes, too few parking spaces, and roads the developer keeps

The homes themselves fall short of national standards. On the developer's own schedule, a number of the affordable homes are below the National Described Space Standard — too little built-in storage, and, if they are the three-bedroom houses the schedule labels them, too small

overall. The parking is short too: measured against Kent County Council's current rural parking standard, the scheme provides at least nine fewer spaces than required, with some homes given just one space where two are needed — in a village where most households run two cars. The shortfall will simply spill onto Church Lane. Kent Highways have now made the same point, asking the developer for a parking plan because the scheme cannot currently be shown to meet the standard.

And the developer has said it will not hand the roads over to be adopted (Transport Statement, paragraph 4.2.4). That means the residents of these 64 homes — not the council — would be left paying, for ever, to maintain the streets, the street lights and the flood-drainage system that protects everyone downstream. If that drainage is neglected, it is our homes, not the developer's, that flood. The council should not accept a scheme whose safety-critical drainage is left to a private management company with no public backstop.

5. Services are already full

East Peckham has no GP surgery. Getting an appointment at the practices around us is a daily struggle familiar to every family here, and reaching them without a car — especially Yalding, which floods — is close to impossible for many. This is not just our impression: NHS Kent and Medway has confirmed the development would increase demand on local GP surgeries and is asking the developer for nearly £87,000 towards healthcare, and Paddock Wood Town Council has objected precisely because our new residents would place further pressure on their already-stretched health centre. Our village school, halls and clubs are the heart of a community that has absorbed change before; but 64 households, on top of the 586 homes the draft Local Plan already sketches for this village, with no new surgery, no new bus and no new road, is not "sustainable growth". It is load piled onto services that are already full, in the one Borough village least able to take it.

There is also the loss of our dark skies. These fields sit on a dark rural edge, and the developer's own bat survey found seven species of bat feeding along the very hedges this estate would light up — yet no lighting plan has been submitted at all. Suburban street and security lighting here would harm protected wildlife and erode the quiet, dark character that makes this the countryside.

And there is the water. East Peckham sits in South East Water's Cranbrook supply zone — a zone whose own statutory plan shows no spare supply for years to come, and whose growth forecasts were last updated in March 2020, before Paddock Wood's huge recent expansion in the same zone. The developer has now, belatedly, submitted its water evidence — but far from resolving the problem, it confirms it. The evidence shows only that the local pipes can carry the flow to the site; it does not show there is spare water in the region to supply it. Indeed it repeats South East Water's own warning that they "could not accommodate any further development other than what they had already planned for", with the whole Kent region heading into shortage by 2030.

6. Let the proper process decide — as it did in 2024

The Council is preparing its new Local Plan now, and our community is preparing its Neighbourhood Plan, with a referendum expected in December 2027. Those are the processes — with evidence, examination and a public vote — where decisions about whether and where East Peckham grows should be made. This developer has promoted this land since 2016 and can promote it there. Instead, for the second time, they are trying to jump the queue with a stand-alone application before the plans are settled, on land the Council's own 2025 Green Belt assessment rates as strongly performing. We ask the Council to show residents that its own refusal of October 2024, on this same land, still means something.

What we ask

- Refuse application TM/26/01252/FL.
- If officers are minded to recommend approval, take the decision in public at Planning Committee, and give residents the opportunity to speak.
- Do not determine the application while the county highway authority, the county flood authority and the fire service are still unsatisfied — and re-consult them, and the Environment Agency, on the developer's revised drainage before any decision is taken.
- Challenge the Environment Agency on how thoroughly it reviewed this site, and carry out the Council's own flood-risk "sequential test", which nobody has passed.

We support the detailed objection submitted by East Peckham Parish Council, and add our names below as residents who know this land, this river and these roads.

Add your name

Name / Address (street and settlement) / Signature / Date

—

—

—

—

—

