

## Retail

The TMBC Local Plan seeks to protect the 'vitality and viability' of an existing commercial village centre and this is particularly important for a regional service centre.

There are currently three medium sized convenience stores / supermarkets in Borough Green and a variety of good quality specialist shops that make Borough Green unique for food retail.

This sector expanded approximately six months ago when a third convenience store opened where only two were viable previously. Presumably this was timed to capitalise on the expansion of housing due to new consents within Borough Green.

***"Policy CP22.2 proposals which might harm the vitality or viability of an existing centre either in terms of retail impact, or in the case of smaller centres, undermining the balance of uses or harming their amenity, will not be permitted."***

Given that the convenience store offering has only recently increased by 50% and that there is also a significant array of competing specialist food retailers like green grocery, butchery, a baker and several delicatessens then a fourth store that competes with all of these is both 'unbalanced' and certain to harm both the vitality and viability of the existing centre.

Borough Green has a unique and inter dependant commercial centre with a range of top quality specialist food retailers and they have flourished simply because there has not been over provision from large chains.

## Leisure

WPC refutes the assertion that the Public House is unviable and notes that the claim is unevicenced. It is undoubtedly true that the company who own the freehold have had a deliberate policy over decades of under investment and in the case of other owned pubs there has been repeated attempts to convert the buildings to other more profitable uses by using the lack of investment as 'evidence' of unviability.

***POLICY CP26 3. Proposals for development that would result in the loss in whole or part of sites and premises currently or last used for the provision of community services or recreation, leisure or cultural facilities will only be proposed in the LDF or otherwise permitted if:***

***(a) an alternative facility of equivalent or better quality and scale to meet identified need is either available, or will be satisfactorily provided at an equally accessible location; or***

***(b) a significant enhancement to the nature and quality of an existing facility will result from the development of part of that facility; or***

***(c) the applicant has proved, to the satisfaction of the Council, that for the foreseeable future there is likely to be an absence of need or adequate support for the facility.***

In the rural environment there is only limited access to more urban pursuits like cinema, theatre, ten pin bowling and a host of other forms of entertainment that are taken for granted by young and old in more urban environments. In this context the humble village pub has a far greater importance than the equivalent in urban areas. It is often the only form of informal community entertainment and social release and transport is difficult with late night public transport limitations and responsible driving choices.

Borough Green, with a population around 4,300 on completion of consented development will only have one pub and a small bar serving non 'Ale' drinkers that regularly appears to be 'For Sale'.

The NPPF Planning Guidance for 'Local Plan' making, stresses the importance of sustainability as a concept and focuses on three important pillars, one of which is addressing an areas social needs. Often this is condensed down to local housing by LPA's because this is a government target, but social well-being is a combination of many aspects and the opportunity to socialise informally with friends is paramount. This can take the form of village halls that are available for hire for parties and social gatherings but nothing can replace a local pub where anyone can drop in for a chat over a pint or a coffee, a place which might host a band on a Saturday Night or a Quiz Night on Thursday and you cannot beat their fresh fish and chips with mushy peas as a Friday Night staple!

An LPA cannot justify consenting developments like Isle Quarry West and then strip out all local opportunities for informal leisure and recreation for a population approaching 4,700 when the developments are completed.



**Design**

Policy CP24 and Policy SQ1 both require high standards of design for new development that 'respect and integrate with their surroundings'. New development should protect, conserve and where possible enhance the character and local distinctiveness of the area including historical and architectural interest. The Borough Green Character Area SPD sites Clokes Store, Henry Simmons and the railway station as a distinctive group of late Victorian buildings built on a grander scale and with more ornate details than elsewhere in the area. The SPD also confirms Henry Simmons Pub as a 'local landmark' due to its scale, prominent gables, decorative ridge tiles and finials, half timbering and tall chimneys.

It therefore seems perverse that the applicant is proposing to eradicate much of this noted detail in the end elevation and replace it with a sign. Refer to 'SIGNAGE ZONE' in the left hand drawing of the end elevation. In addition the "Hit and Miss" Picket type fence perched incongruously on top of a flat roofed extension would not make a positive contribution to the local character or distinctiveness of the area, but would cause harm to a venerated local landmark.



***. POLICY CP24 1. All development must be well designed and of a high quality in terms of detailing and use of appropriate materials, and must through its scale, density, layout, siting, character and appearance be designed to respect the site and its surroundings.***

***3. Development which by virtue of its design would be detrimental to the built environment, amenity or functioning and character of a settlement or the countryside will not be permitted***

### **Plant and Machinery**

An array of fans and refrigeration condensers are to be located behind the picket fence and directly in front of residential flats that remain lessees of the freeholder, refer above. The proposal will impact on the amenity of the lessees in terms of light into their property and unwanted noise of refrigeration & air-conditioning. The design of the rear extension with machinery exposed on the roof, hidden behind a picket fence is of very poor quality and detracts from late Victorian character of the area

### **Development Proposal**

The applicant's claims regarding the increased employment opportunities are in our view overstated. The over provision of four convenience stores competing with a variety of specialist food retailers would inevitably cause unviability in the sector with its attendant redundancies.

The applicant's assertion that paragraph 2.5.13 of the Core Strategy which states there 'may' be scope for 'limited' retail development is outdated. At the time of writing the Core Strategy in 2007 that may have been justified, given the new housing developments but with the recent opening of the third such shop there is now over provision of food retailing.

### **Highways**

WPC is concerned about servicing the proposal. There will be fourteen HGV movements daily and Kent Highways are concerned about visibility for lorries emerging from the site. In addition the junction is poor and apt to become log jammed at times, particularly during the school peak periods.

### **Summary**

1. The recent increases in convenience store floor space has made the current sector over provided for. It is anticipated that the new housing currently being built will take up this slack in due course. A fourth convenience store however will make the current balance unviable and cause harm to the retail centre of Borough Green.
2. When the LPA consents large housing developments in an area there is a duty and requirement to provide adequate opportunities for informal relaxation and leisure. If this were to be consented then it would leave only one public house for a population of 4,300, which would be lamentably inadequate.
3. The design of the extension with the bizarre rooftop enclosure is detrimental to a cited late Victorian landmark and part of an important small group of such buildings. The signage proposals will also obliterate a proportion of the fine detail of the cited building.
4. The noise emitting equipment to be located immediately adjacent to existing residential units will affect the personal amenity of all the occupants. It will also impact on the amount of light that the residences currently enjoy.
5. Servicing of the proposal by fourteen HGV vehicle trips has implications both for safety of the junction and the ability of the junction to support through traffic, particularly during school peak periods.
6. Wrotham Parish Council objects for all of the listed reasons.