

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

SESSION 7 - RURAL SERVICE CENTRES

1. SPATIAL STRATEGY

Qn7.1 If the level of housing identified in the Local Plan is confirmed at 18,560 (or a similar figure), what reasonable alternative strategy would be preferred by those who oppose the scale of housing development proposed at the rural service centres and why?

The Spatial Strategy Topic Paper 2016 (SUB 007) at paragraph 6.12 with regard to the role of rural service centres sets out that:

'In order to continue to support these settlements in serving their local area by retaining vital services and reducing the need to travel, some appropriately scaled development is proposed at these locations.'

A dispersed development pattern has been a stated approach since the 2007 Core Strategy Preferred Options. This proposed that 5% of the housing requirement would be located in the 5 Rural Service Centres and 21 larger villages. This has now risen to around 25% of the housing requirement in the 5 Rural Service Centres and 4 larger villages.

The plan now proposes significant growth at Lenham (+110%), Staplehurst (+30%), Marden (+28%), Harrietsham (+28%) and Headcorn (+27%). At Headcorn almost 500 dwellings have been permitted compared to the 423 allocated in the plan. Whilst for the larger villages it is +8.5% at Boughton Monchelsea, +9.5% at Eyhorne Street, +6.4% at Sutton Valance, and +25% at Yalding.

CPRE Kent considers that this level of growth is not appropriately scaled development for these villages.

Employment, either through the expansion of existing employment areas or allocations is only proposed at Headcorn and Marden. This is likely to encourage greater out-commuting rather than reducing the need to travel as stated in SUB 007 paragraph 6.19.

The decision to leave the European Union and the Government's desire to reduce net International migration to under 100,000 by 2020, if successful, could result in a lower population estimate than that provided in the 2012-based Subnational Population Projection and 2014-based Subnational Population Projection. This in turn could result in a reduced housing need.

CPRE Kent considers that greater use could be made of some of the allocations within Maidstone town, for example:

- Allocations sites H1(27) Kent Police HQ and H1(28) Kent Police training school both have an average density of 35 dwellings per hectare. This is low density, suburban in nature. Given their location a higher density may well be appropriate.
- H2(2) Invicta Park Barracks is put forward in the plan for 1300 dwellings on 41 hectares. This is 32 dwellings per hectare and is low density of a suburban nature. Allocation H1(11) Springfield, Royal Engineers Road and Mill Lane, has an average density of 132 dwellings per hectare which is high density of a city nature. H2(2) and H1(11) are located close to each other and front onto the A229 Sandling Road. Given the size of the Invicta Park Barracks site and its location there may be an opportunity for the site to be developed at a higher density.

Increasing densities on these sites of the magnitude suggested above would result in additional dwellings in the Maidstone urban area. This would be consistent with the plan strategy. This would reduce the need for the scale of additional housing at the larger villages and rural service centres.

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2. LENHAM

Qn7.3 Should the Local Plan identify that specific sites in the Broad Location are to be allocated by means a review of the Local Plan?

It would be appropriate for the plan to make clear that specific sites in the Broad Location will only be considered through the review of the Local Plan or the Neighbourhood Plan.

Qn7.5 What would trigger the release of broad location land before 2026 and should that be more explicit in the Policy?

It would not be appropriate for greenfield land to be released prior to the adoption of the review of the Local Plan and / or Neighbourhood Plan for the following reasons:

1. Large brownfield sites might become available;
2. Land within the identified broad location could have an adverse impact on groundwater supplying water the river heads in these areas;
3. The environmental permit for the extension of the Sewage Works is still outstanding and the sewage works have not expanded in line with the expected requirements
4. It has still to be determined whether additional waste water treatment capacity can be provided at the Lenham WTW.
5. The decision to leave the European Union may result in a lower housing requirement post 2020.

Qn7.6 In the alternative, should housing sites be allocated in the Lenham Neighbourhood Plan instead of a Review of the Local Plan

The NPPF (paragraph 16) sets out that neighbourhood plans should support the strategic development needs set out in Local Plans and that they should plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

Policy H2(3) identifies Lenham as a location for housing growth post 2026. The Local Plan at paragraph 9.6 recognises that certain infrastructure improvements and mitigation measures will be required. There are also environmental constraints that may influence the amount and location of any further development, for example: it has still to be determined whether additional waste water treatment capacity can be provided at the Lenham WTW, the condition of the River Stour and traffic/highways. The decision to leave the European Union may reduce the level of future international migration and thus housing need post 2020.

Given that the Local Plan does not identify sites for the post 2026 period it would be appropriate for the Neighbourhood Plan to allocate sites.

Qn7.9 Should the planning permission for 82 dwellings on the land West of Ham Lane be considered as part of the Broad Location figure of 82 dwellings or as an addition to it?

CPRE Kent considers that this should not form part of the Broad Location figure.

The 82 dwellings should be used to enable the deletion of the very sensitively located allocation site H1(42) Tanyard Farm.

Qn7.10 Is it realistic to expect the remainder of the H2(3) Lenham Broad allocation for 1,500 dwellings to be delivered within a 5 year period (2026-2031) at an average rate of 300 dwellings each year?

The construction of 1500 dwellings in 5 years implies an annual build out rate of 300 a year. This is a demanding task. A number of the sites within the broad location are large sites, for example off Old Ham Lane (400) and Tanyard Farm (350-400). These may take

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longer to come forward and could result in the 1,500 not being delivered in the plan period.

Delivery will also depend on the timely provision of community infrastructure along with additional wastewater treatment capacity and sewerage infrastructure along with agreement of who will pay and the timing of any payment.

CPRE Kent is concerned that this scale of development would transform the nature of the village and that doubling the number of homes in such a short period of time would put great pressure on social cohesion between existing and new residents.

Qn7.11 If not, should at least part of that allocation be allocated at an earlier date either by the Local Plan or the Neighbourhood Plan?

No.

See our response to Qn7.1 above.

Qn7.13 Has the identification of the Broad Location had sufficient regard to the setting of the AONB and has this been addressed in the subsequent exploration work?

We do not consider that the identification of the Broad Location has had sufficient regard to the setting of the AONB, particularly to the East of Lenham which is in full view from the AONB, the Northdowns National Trail, the Lenham Cross and the SSSI.

It is our understanding that it is the intention of the Neighbourhood Plan to identify sites away from the AONB to the south of the railway. This is in our opinion a better option because of our concerns regarding the impact of development on the supply of groundwater to the riverheads of the Stour.

Qn7.14 Has the identification of the Broad Location had sufficient regard to ground water drainage considerations?

It is noted that the Strategic Flood Risk Assessment [SFRA] (CC 001) was published in May 2008 over 8 years ago. It is noted that Session 10A paragraph 2.6 the Environment Agency consider the SFRA to be out of date. We are unable to locate the Borough Council's review of the SFRA by Jeremy Benn Associates nor a Statement of Common Ground with the EA which according to the Council's letter dated 18 July 2016 were expected to be completed and published in advance of the examination hearings

The SFRA Summary at page S-3 states: *'Further work should be carried out to model the River Len, River Loose and their tributaries. Currently there is a lot of uncertainty regarding the flood modelling techniques adopted along the River Len and the River Loose, ..'* Whilst Figure 4.1 Reported Flood Incidents identifies sewer flooding in the village, surface water flooding on greenfield land to the west of the village within the Broad Location and groundwater flooding east of the village, also within the Broad Location.

Groundwater flooding has been recorded by the Environment Agency and KCC on Old Ashford Road and along the railway embankment.

The Water Cycle Study (CC 002) published in June 2010 and is over 6 years old. The study was based on 11,880 dwellings and 10,000 jobs over the period 2006-2026. The housing number is now 18560, an increase of nearly 60%.

NPPF paragraph 158 requires local planning authorities to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence.

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The Planning Practice Guidance at the section on ‘*What evidence is needed to support the policies in a Local Plan?*’ (Reference ID: 12-014-20140306) provides the following further guidance:

‘The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date. For example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage).’ [My emphasis].

The SFRA and Water Cycle Study have not been updated. Given the age of the studies and that the housing numbers and their distribution has changed it is unlikely that they are adequate, up-to-date, or relevant. This causes concern for the general location of the Broad Location and its impact on the locality, including the impact of development on the supply of groundwater to the riverheads of the Stour

Qn7.16 If the number of dwellings to be provided were to be reduced to that proposed in the Neighbourhood Plan, what implications would that have for development elsewhere? Lenham Housing Site Allocations

Please see our response to Qn7.1 above.

The sites to the south of the railway suggested by the Lenham Neighbourhood Plan will allow for high density as these areas are largely hidden from views from the AONB and well away from Heritage assets. Housing should be in areas which are not as ecologically sensitive.

H1(42) Tanyard Farm, Old Ashford Road (155 dwellings)

Qn7. 18 Do the conclusions of the Inquiry for land west of Ham Lane have any implications for the H1(42) allocation in relation to the setting of the AONB?

The Inspector in his report at paragraph 61 writes: ‘.. *The merits or otherwise of individual allocations remain to be addressed as part of a future Local Plan examination but I acknowledge the evidence regarding the contrasting characteristics of a retained allocation at nearby Tanyard Farm (previous emerging Local Plan Ref: H1(29), now H1(42)). In particular, I note the evidence submitted that the retained site appears to have a more sensitive relationship to the AONB. ..*’

The AONB boundary abuts the north side of the A20 immediately north of H1(42) whereas it is set back and does not abut the A20 opposite the Ham Lane site. The Ham Lane decision should not be used to justify development on this site.

We consider that the site H1 (42) Tanyard Farm is in our opinion not suitable for housing because:

- It is in a prominent location in the open foreground of the AONB and would impact on views from and to the AONB (Policy SP17 5).
- It lies in East Lenham Vale which the Landscape Capacity Study (ENV 001) where the summary of actions sets out ‘*Conserve the defined boundary between Lenham’s compact settlement and the surrounding countryside*’.
- The site allows views to the Memorial Cross.
- It comprises an unacceptable expansion of Lenham and comprises ‘urban sprawl’.
- Screening would impact on views to the AONB and the Lenham Cross from Old Ashford Road.

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- The North Downs Aquifer extends into the site and development is likely to interfere with groundwater flow.
- It would impact negatively onto the scenic views from the footpath leading from Old Ashford Road to the Northdowns National Trail.
- Groundwater flooding is recorded on the southern side of the Old Ashford Road.