

Staplehurst Parish Council Comments on MBC Regulation 18 Draft Local Plan

Agreed by Full Council Meeting on 19 October 2015

These comments refer specifically to the alterations to the emerging Maidstone Borough Local Plan proposed in the Regulation 18 Draft and should be read in conjunction with Staplehurst Parish Council's earlier comments on the draft Local Plan, which remain valid, and the Staplehurst Neighbourhood Plan (now in the process of Regulation 16 consultation). In particular, Staplehurst Parish Council (SPC) questioned the validity of the overall housing targets for the Borough, asked what services this Local Plan would protect in Rural Service Centres, and deplored the failure to co-locate housing and employment developments, thus placing additional strain on an already inadequate transport network. In relation to the proposed housing developments in Staplehurst, SPC questioned whether the numbers proposed were sustainable or indeed deliverable, without substantial and early investment in infrastructure to mitigate the constraints relating to roads, surface water drainage, sewerage and community facilities, to which SPC has referred frequently.

SPC also wishes to comment that while this Local Plan is intended to cover the period to 2031, both the sites in Staplehurst which were identified in the original Draft Local Plan and included in the Staplehurst Neighbourhood Plan have been the subject of planning applications by developers. SPC therefore wishes to know whether, in the event of the sites identified in the original Draft Local Plan and any additional sites arising from this Regulation 18 Draft having been developed during the first years of the eventual Local Plan, the Local Plan would provide robust grounds for refusing any further significant housing development in Staplehurst before 2031?

Policy SP5: SPC generally supports Policy SP5 as amended, especially the reinstatement of the Low Weald as a landscape of local value. However, we consider that the Low Weald landscape area as shown south-east of Staplehurst should be extended to link with the designated area around Staplehurst, and that area west of the A229 corridor should be designated, as this is of similar value to that east of the A229 and is prominent in long-distance views from the higher ground north and east of Goudhurst and forms part of the setting of the High Weald AONB.

Policy H1(68): Addition of housing site allocation north of Henhurst Farm, Staplehurst: The additional housing area as proposed in this new policy is not acceptable. SPC objects to the proposed single access from Marden Road via Oliver Road and the Taylor Wimpey development south of Oliver Road now under construction - which was designed and laid out without provision for a substantial volume of through traffic. SPC considers that a second vehicle access would be necessary, although this would not be possible without acquiring further property or rights over Bell Lane which is not a public highway. We consider that the effect on traffic in Pope Drive, Bathurst Road and Offens Drive would be highly detrimental and that highway improvements would be required at the junction of the A229 and Offens Drive, in addition to the junction of the A229 and Marden Road. The new housing would be visible for a long way from the south, and

would adversely affect the quality of the landscape. The emerging Staplehurst Neighbourhood Plan rejected substantial development on the south side of the built-up area for this reason. SPC has serious doubts as to the capacity of the existing drainage system to cope with further development, particularly in regard to sewerage, in the light of the current inadequacy of the existing sewerage network in the Marden Road area and the lack of additional capacity at the Staplehurst sewage treatment works.

Should this site be considered in spite of SPC's objections, we recommend that the areas proposed for conservation, allotments and open space should be transferred to a public body for public use in perpetuity and (together with the environmental areas provision of which was a condition of planning permission for the current development south of Oliver Road) should form a clear south-eastern boundary to the expansion of the settlement of Staplehurst. The arrangements proposed for the current Oliver Road development might be a suitable model for such a transfer. In view of the visibility of this site we endorse criterion 6, calling for a high standard of design and the use of vernacular materials. We emphasise the importance of criterion 12 (flood risk and drainage) and would wish to see an additional reference to sewerage.

Policy EMP1(5): Additional employment site at Woodcut Farm, Ashford Road, Bearsted. In addition to objections on environmental and landscape grounds, SPC considers that the location of further employment, particularly of the type proposed in this policy, at Junction 8 is not sustainable. The site is admittedly poorly served by public transport and most employees are likely to reach it by private transport. In view of the fact that considerable new housing is already allocated to the rural service centres of Marden, Staplehurst and Headcorn, SPC considers that this proposal would put still further pressure on the A229 corridor and on the road network in the inner area of Maidstone town. If this site is to be considered at all, it should be contingent on the completion of the Leeds-Langley bypass, and on a westward extension of this (as new or upgraded road) to link with the A229 in the Linton/Coxheath area. In general, SPC considers that insufficient consideration has been given to the establishment of high quality employment (as distinct from warehousing and distribution) along the corridor of the Tonbridge-Ashford railway line.

7: Proposed New Gypsy and Traveller Site Allocations. In general, SPC is unconvinced by the methodology adopted by Maidstone Borough Council to estimate the need for such sites, and considers that application of the Government's current criteria would lead to a considerable reduction in demand. In terms of the two sites in George Street, Staplehurst, proposed for expansion in GT1(13) and GT1(14), SPC considers that given the conditions proposed the development may be acceptable, although it is noted that there are surface water flooding issues in the vicinity, that road access is by narrow lanes, and that pedestrian access to village facilities would be by a narrow lane with no lighting or footway and then by a foot crossing over the busy Tonbridge-Ashford railway (this was one of the reasons quoted by the Planning Inspector in supporting the refusal of planning permission for a development of affordable housing north of George Street). Given the allocation of Gypsy and Traveller sites in the emerging Local Plan, SPC would expect further expansion of Gypsy and Traveller sites elsewhere in Staplehurst - particularly in the Frittenden Road, Maplehurst Lane and Park Wood Road area - to be

strongly resisted.

8: Proposed New Open Space Allocations. SPC notes that the new sites allocated for natural or semi-natural open spaces in Staplehurst are all associated with proposed major housing developments and that various constraints - particularly ponds for surface water drainage - may restrict the use that can be made of them.

In relation to the two sections of open space at Hen and Duckhurst Farm, Marden Road (OS(10)), the eastern section appears to be intended to provide a “green wedge” between the new development and the existing Lime Trees estate, and if so, it should extend further south. The western area should provide a boundary to future expansion to the west, and we would recommend that the detailed layout of the housing on the site should provide for houses to face this open space, as described in the emerging Staplehurst Neighbourhood Plan.

We note that the detailed layout of the open space for Fisher’s Farm (OS(11)) has yet to be determined. We are aware that this single site is currently the subject of planning applications by two separate developers, and we consider that a joint master plan for the site as a whole (as referred to in the emerging Staplehurst Neighbourhood Plan) is necessary in order to ensure an appropriate layout of the open space, in addition to other considerations. The primary road access to the Fisher’s Farm site will be from Headcorn Road rather than Fisher’s Road, and it might avoid confusion if the site was referred to as “Fisher’s Farm, Headcorn Road”.

We have commented on the proposals for open space in connection with the proposed new housing allocation north of Henhurst Farm (OS(12)) above, in connection with policy H1(68), to which SPC has objected. Should policy H1(68) be adopted in spite of SPC’s objections, this open space would play an important role in somewhat reducing the impact of the new development as seen from the south, and the detailed design should take this into consideration, .

SPC expects that the details of design, layout, ownership, use and management of all these proposed new open spaces will be the subject of adequate consultation with SPC and the local community at an early stage, and that all the space will be freely accessible to the public, apart from any restrictions which may be necessary for the protection of wildlife.

10: Nursing and Care Homes: SPC generally supports this policy, while noting that Criterion 2 of Policy DM42 - “Sufficient visitor and staff vehicle parking is provided in a manner which does not diminish the character of the street scene” - although it is highly desirable, has in its experience been difficult to implement in practice.

11: Park and Ride site allocations for deletion: SPC notes Policy PKR1(1), the deletion of the proposed Linton park and ride facility. While SPC considers that this Park and Ride site and its associated housing development as originally proposed were inappropriate and poorly thought out, it should be noted that the deletion will mean that no relief is envisaged for access to Maidstone from the south. Very substantial housing development is proposed in the draft Local Plan or is actually in progress in Staplehurst and Marden, both served by the A229, and in Langley and Headcorn, served by the A274, which joins the A229 at the congested Wheatsheaf junction. In addition, outside the

MBC area, considerable housing development is envisaged in Cranbrook and Hawkhurst, which will place further pressure on the A229 corridor. SPC does not believe that “the implementation of complementary public transport priority measures both to access the site and moreover along the route” will be adequate to increase capacity of the A229/A274 corridor sufficiently, or that it is even physically possible at many points along the route. SPC considers that without very substantial improvement in transport infrastructure, it will not be possible for MBC to achieve both its objectives of locating a large amount of new housing in the south of the Borough and of maintaining the viability of the Maidstone urban area as an important destination for shopping and employment.

13: Sustainability Appraisal: SPC does not propose to comment on this in detail, but notes that it appears to have been a desk exercise and some of the data appear questionable in the light of local knowledge. Should such an appraisal be repeated in future, it is suggested that limited local consultation should be carried out to ensure that the data on which decisions are made are accurate and relevant.

TGB/19.10.2015