

## Annex B - Marden Parish Council response to Regulation 18b Preferred Approach Policy LPRSA314 Land east of Albion Road, Marden

		NPPF paragraph	Local Plan Policy	Marden Neighbourhood Plan
Conclusion and summary	<p>Site 314 is considered unsustainable and unsuitable for housing development because:</p> <ul style="list-style-type: none"> <li>• Pedestrian connectivity with the village centre is poor</li> <li>• Vehicular access into and out of the site, and through and around the village, would cause significant impacts at a number of locations</li> <li>• The A229 to Maidstone is already heavily congested, and connections to other large towns and the motorway / trunk road network are along narrow, minor country roads</li> <li>• The visual impact of development on this elevated site is likely to be far reaching, especially from the south</li> <li>• There are limited employment opportunities in Marden, with both car and public transport options for those seeking to work in Maidstone likely to remain poor</li> <li>• Commuting to London by train is likely to be the only option for many, but services are already full during peak periods – with no prospect of increased capacity – and this can only worsen with further housing developments</li> <li>• Access to retail and leisure facilities is constrained in a similar way to employment opportunities</li> <li>• The water, sewerage and electrical systems in Marden are already under great strain, even without any further housing developments</li> <li>• The environmental and ecological impacts would cause irreversible harm</li> <li>• Adversely affects the amenity of the area</li> </ul>	20, 78, 84, 91, 92, 94, 98, 102 to 104, 108, 109, 112, 127, 149, 170, 175, 181, 182, 189 to 193	SP5, SP9, SP17, SP18, SP23, DM1, DM2, DM3, DM4, DM6, DM20, DM21, DM30, ID1	NE3, NE4, NE5, BE1, In1, In2, In3, In4, A1, A3, A4, E1, E2

### Comments relating to conditions in MBC Preferred Approaches document

Access, Highways and Transportation	<ul style="list-style-type: none"> <li>• The capacity of Albion Road is heavily constrained by on-street parking. The removal of resident parking in Albion Road, as recommended in the Preferred Approaches document, will only add to congestion in other parts the village as those residents do not have off road parking..</li> <li>• Under the ‘Access to Public Transportation &amp; Services’ assessment, the Strategic Land Availability Assessment (SLAA) records (with added emphasis): <ul style="list-style-type: none"> <li>○ <i>“Required mitigation measures unfeasible due to the requirement for 3rd party land, or the requirement to remove existing resident parking (with no apparent alternative) on order to achieve suitable road widths. <b>Site recommended as unsuitable on access grounds.</b>”</i></li> <li>○ <i>“Required mitigation unfeasible due to the scale of the site and an insufficient number of units to support a new bus route and the requirement for 3rd party land. <b>Site recommended as unsuitable on sustainability grounds.</b>”</i></li> </ul> </li> <li>• Other conditions Marden Parish Council would prefer to see added <ul style="list-style-type: none"> <li>○ Pedestrian access to the site from the village centre on the east side of Albion Road to be installed prior to commencement of construction</li> <li>○ Provision of a gateway feature at the 30mph limit on Thorn Road</li> <li>○ The road junction at Plain Road and Thorn Road to be one way around the triangle</li> <li>○ Provision of a pedestrian island in the centre of High Street and Albion Road junction</li> </ul> </li> </ul>
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### Comments relating to the site

Site Reference: 314	Rear of The Howlands, Albion Road	Policy considerations		
		NPPF paragraph	Local Plan policy	Neighbourhood Plan
<b>Physical and social connectivity</b>	<ul style="list-style-type: none"> <li>There are very limited pedestrian links to the village, with no footways on the east side of Albion Road south of Seymour Drive or south of Jewell Grove on the west side (see Figures 1 and 2).</li> <li>There are no public footpaths across the site, and Footpath KM281 on the opposite side of Albion Road from the site (linking with the 'Windsor Meadow' development) is unsurfaced and very narrow between high hedges (see Figure 3).</li> <li>Albion Road, in the vicinity of the site, is narrow and unlit south of Jewell Grove.</li> <li>There is a very limited daytime bus service along Albion Road, with no buses on Sundays.</li> <li>The site is adjacent to the new development at Russet Grove (reference: MA 17/504754) currently under construction but there appears to be no provision for a pedestrian connection between the two sites.</li> </ul>	78, 84, 91, 98, 104, 182	SP5, SP9, SP17, SP23, DM1, DM21	BE1, In2
<b>Highway considerations</b>	<ul style="list-style-type: none"> <li>As noted above, Albion Road is narrow, unlit south of Jewell Grove and has no footway on the east side south of Seymour Drive (see Figures 1 and 2).</li> <li>For all traffic movements, there would be a significant impact from additional traffic entering and leaving the site from/to Albion Road.</li> <li>The capacity of Albion Road is heavily constrained by on-street parking. The removal of resident parking in Albion Road, as recommended in the Draft Preferred Approach document on page 179, will only add to congestion in other parts the village as those residents do not have off road parking.</li> <li>For traffic heading to or from the Maidstone, Staplehurst or Yalding directions, there would be significant impacts from additional traffic at the Albion Road / High Street / Howland Road T-junction, at the High Street / B2079 Maidstone Road T-junction and the length of B2079 within the village envelope used for on-street parking.</li> <li>The A229 to the north of Linton and into Maidstone is also inadequate and already heavily congested, and constraints mean that the planned improvements to the Wheatsheaf roundabout and Linton Crossroads are unlikely to be sufficient to accommodate the additional traffic over the longer term.</li> <li>Road connections to the west of Marden to amongst others Paddock Wood, Tonbridge, Tunbridge Wells and Kings Hill are along narrow, minor country roads. Road connections to the east of Staplehurst towards Headcorn and Ashford are equally poor.</li> <li>Connectivity to the motorway and trunk road network, in whichever direction, is slow and poor along country lanes.</li> <li>For traffic heading to or from the Goudhurst, Paddock Wood, Tonbridge or Tunbridge Wells directions, there would be significant impacts from additional traffic at the Albion Road / Plain Road / Thorn Road T-junction and at the Thorn Road / B2079 Goudhurst Road / Shephurst Lane crossroads.</li> <li>Under the 'Access to Public Transportation &amp; Services' assessment, the Strategic Land Availability Assessment (SLAA) records (with added emphasis): <ul style="list-style-type: none"> <li><i>"Site recommended as unsuitable on access grounds due to the need to remove existing resident parking, with no alternative apparent, or for 3rd party land to widen the road, in order to provide suitable access to the primary road network."</i></li> <li><i>"Required mitigation measures unfeasible due to insufficient site scale to achieve increased bus service regularity, even when considered collectively with adjacent sites 295 and 269. Site recommended as unsuitable on sustainability grounds."</i></li> </ul> </li> </ul>	84, 102 to 104, 108, 109, 181	SP23, DM1, DM6, DM21, DM30	In2, In3

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Site Reference: 314	Rear of The Howlands, Albion Road	Policy considerations		
		NPPF paragraph	Local Plan policy	Neighbourhood Plan
<b>Character and setting</b>	<ul style="list-style-type: none"> <li>The site is on an elevated position and visible on the skyline across the open fields (depending on season) from Copper Lane, Thorn Road and Marden Thorn, which means that any development will have the potential for harmful impact on the surrounding countryside (see Figure 4).</li> <li>Under the 'Landscape Character' assessment in the SLAA, it is stated that the <i>"The Landscape Character Assessment identifies that the site is within the Staplehurst Low Weald landscape character area, which forms a part of the Low Weald landscape character type. The overall condition of the area is considered to be Good, and the sensitivity to be High, with an overall recommendation to Conserve."</i></li> </ul>	127, 170	SP17, SP18, DM1, DM2, DM3, DM30	NE3, NE5
<b>Heritage</b>	<ul style="list-style-type: none"> <li>There are three Grade II listed buildings in close proximity to the site: <ul style="list-style-type: none"> <li>Jewell House / Bishop House</li> <li>Stone Pit Farmhouse</li> <li>Barn north west of Stone Pit Farmhouse</li> </ul> </li> <li>Under the 'Archaeology' assessment in the SLAA, it is recorded that there is <i>"potential for Bronze Age and later prehistoric remains as well as post medieval agrarian heritage remains."</i></li> </ul>	189 to 193	DM4	BE1
<b>Fluvial and surface water flooding</b>	<ul style="list-style-type: none"> <li>No known flood risk issues.</li> <li>Under the 'Drainage' assessment in the SLAA, it is recorded that <i>"No watercourses showing up from mapping however that does not mean they are not present. Further investigation needed as to method of discharge."</i></li> </ul>			
<b>Ecological considerations</b>	<ul style="list-style-type: none"> <li>Residents have reported evidence of Birds of Conservation Concern 4 (BoCC 4) red listed species (yellowhammers, woodpeckers, and fieldfares) on the site.</li> <li>Under the 'Ecology (including ponds)' assessment in the SLAA, it is recorded that <i>"GCN have been recorded within the surrounding area so may be present. The rough grassland/scrub area may provide suitable habitat for reptiles."</i></li> </ul>	175	DM1, DM3	NE4
<b>Education and health</b>	<ul style="list-style-type: none"> <li>There are limited pedestrian links to Marden Primary School, Marden Medical Centre or Marden Dental Surgery, and there are already difficulties reaching Maidstone and Pembury Hospitals and the county town's secondary schools, especially during peak hours and on public transport.</li> <li>Any large-scale development south of the Greensand Ridge can only worsen the existing situation and prove increasingly unattractive to potential residents of the site when combined with the 'baseline' development allocations in the current local plan.</li> </ul>	20, 78, 84, 91, 94	SP5, SP9, DM1, DM20	A1, A3, A4
<b>Employment</b>	<ul style="list-style-type: none"> <li>There are limited local employment opportunities in Marden, and as noted above both car and public transport options for those seeking to work in Maidstone are likely to remain poor.</li> <li>Some employment opportunities may exist in Tonbridge, Tunbridge Wells or Ashford, but commuting to London by train is likely to be the only choice for many.</li> <li>Marden railway station is on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near 'standing room only' during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached.</li> <li>Other large-scale housing developments in Staplehurst, Headcorn, Ashford and East Kent will also be putting increasing pressure on train capacity in future years.</li> <li>Marden station already has severe parking problems in a very constrained area.</li> </ul>	78, 84	SP5, SP9, DM1	In4, E1

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Site Reference: 314	Rear of The Howlands, Albion Road	Policy considerations		
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<b>Retail and Leisure</b>	<ul style="list-style-type: none"> <li>As noted above, there is poor connectivity with the existing retail and leisure options available to residents of Marden.</li> <li>Facilities in the town of Maidstone would be similarly difficult for potential residents of the site to access except by car, and even then, increasingly so during peak periods when the combined impacts of current and future developments in the locality add to existing pressures.</li> <li>However, this site is also unlikely to have the ‘critical mass’ to support any retail or leisure options within the development itself.</li> </ul>	78, 84, 92, 182	SP5, SP9, DM1, DM20	A1, E2
<b>Utilities</b>	<ul style="list-style-type: none"> <li>Electricity: <ul style="list-style-type: none"> <li>Marden experiences frequent power cuts during thunderstorms.</li> <li>Impact of additional demand on the existing electrical supply network</li> </ul> </li> <li>Gas: No known issues.</li> <li>Water: South East Water has an ongoing programme to renew and strengthen its existing network, but it is not clear whether this will offer the capacity to deal with the individual and cumulative impacts of additional large-scale housing developments.</li> <li>Sewers: The sewerage system in Marden was already under great strain, even before the recently completed housing developments and those currently being completed. Frequent problems occur at the Roughlands pumping station which connects the village with the Horsmonden wastewater treatment works. The existing sewer network also surcharges during periods of heavy rainfall, causing significant health concerns. All these problems would be exacerbated by any further large-scale housing development.</li> <li>Landline: No known issues.</li> <li>Broadband: Ultrafast fibre broadband is becoming available in parts of Marden, but bandwidth problems are common with standard and superfast broadband.</li> <li>Mobile: No 5G coverage in Marden. 4G coverage is variable, depending on network and exact location.</li> <li>Under the ‘Utilities’ assessment in the SLAA, it is recorded that unspecified utilities are present and that <i>“The developer should ensure that appropriate consultation with the underground utilities operator take place.”</i></li> </ul>	112, 149	DM1, ID1	In1

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*Figure 1 - View of Albion Road looking north from entrance to The Howlands illustrating narrow width and lack of footways*



*Figure 2 - View of Albion Road looking south from junction with Seymour Drive illustrating narrow width and end of existing footway on eastern side*





Figure 3 - View of Footpath KM281 looking east towards Albion Road illustrating narrow width between high hedges and unmade surface



Figure 4 - View from Thorn Road looking northeast towards Site 314 with new housing in the Russet Grove development on skyline beyond