

Borough Councillor
Member/Substitute Member
Strategic Planning &
Infrastructure Committee
Maidstone Borough Council



Mrs Alison Hooker
Parish Clerk
Marden Parish Council
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Date: 5th November 2020

Also sent to:
Helen Grant MP
County Cllr Eric Hotson
Borough Cllr Annabelle
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Dear Cllr

Marden Parish Council requests that members of the Strategic Planning & Infrastructure Committee take account of the following policy considerations and evidence relating to the draft 'Regulation 18b Preferred Approach' document to be consulted on as part of the Maidstone Borough Council Local Plan Review.

'Garden Communities' Site 309 – Land North of Marden

The Parish Council welcomes the omission of Site 309 (Land North of Marden) from the 'garden communities' options to be taken forward under the Borough Council's 'Preferred Approaches' consultation.

For the record, Site 309 was considered to be unsustainable and unsuitable for development for the wide range of reasons set out in Annex A, including:

- 1) The development offers no benefits to the existing community
- 2) Lack of cohesion with the existing community due to severance caused by railway line
- 3) Principle of a 'garden community' – demonstrably neither an extension to the urban area of Maidstone or a new settlement separate from an existing village
- 4) Not in conformity with the Marden Neighbourhood Plan
- 5) Severe environmental and biodiversity impacts
- 6) Poor sustainable transport connectivity with Maidstone and the surrounding area
- 7) Limited local employment opportunities
- 8) Traffic impacts from access into and out of the site, through and around the village, and further afield
- 9) Lack of capacity on the railway
- 10) Overwhelming lack of community support for the proposal

'Garden Communities' Sites 226 – Land North of Staplehurst / Site 318 – Pagehurst Farm

The Parish Council supports the Borough Council's acceptance of the conclusions of the two-part Stantec study of the various 'garden community' proposals that Sites 226 (Land North of Staplehurst) and 318 (Pagehurst Farm) should not be taken forward as part of the 'Preferred Approaches' consultation.

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Housing Sites 295 – Land North of Copper Lane / 314 – Land East of Albion Road

The Parish Council does not agree that Sites 295 (Land North of Copper Lane) and 314 (Land East of Albion Road) should be taken forward for housing development as part of the ‘Preferred Approaches’ consultation for the reasons summarised below.

1) Poor pedestrian connectivity to the village

There are limited pedestrian links to Marden, with no footways on the east side of Albion Road south of Seymour Drive or south of Jewell Grove on the west side. There are no public footpaths across either of the sites and the minor roads in the vicinity are narrow and unlit. Footpath KM281 on the opposite side of Albion Road from Site 314, linking with the ‘Windsor Meadow’ development, is unsurfaced and very narrow between high hedges. For site 295, Copper Lane is a single-track country lane with no prospect of a footway to link to Thorn Road or Howland Road, and no footways on Thorn Road, Albion Road or Howland Road in the vicinity of the site.

2) Significant impacts of vehicular access into and out of the site and around the village

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 Approaches document on page 179, will only add to congestion in other parts of the village as those residents do not have off-road parking. 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. 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. 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. Connectivity to the motorway and trunk road network, in whichever direction, is slow and poor along country lanes.

3) Visual impact of the development on the countryside

Site 314 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. The adjacent Site 295 is on an elevated, sloping, position and visible across the open fields for some miles, especially in a wide arc stretching from the southeast to the west, which means that any development could not realistically be screened and therefore will inevitably have a harmful impact on the surrounding countryside. Even were it feasible, any widening of Copper Lane for Site 295 would result in a significant loss of mature trees, established hedgerows, ditches and numerous ponds on either side, resulting in fundamental impacts to its character and distinctiveness as a ‘quiet lane’.

4) Environmental and biodiversity impacts

Residents have reported evidence of Birds of Conservation Concern 4 (BoCC 4) red listed species (yellowhammers, woodpeckers, and fieldfares) on both sites. For Site 295, Natural England survey records show great crested newts present in the Copper Lane area, and under the ‘Ecology (including ponds)’ assessment in the Strategic Land Availability Assessment (SLAA) for Site 314, it is also recorded that the rough grassland/scrub area may provide suitable habitat for reptiles.

5) Not in conformity with the Marden Neighbourhood Plan

Housing development on both sites would be variously inconsistent with aspects of Marden Neighbourhood Plan (MNP) policies NE3, NE4, NE5, BE1, IN1, In2, In3, LN4, A1, A3, A4, E1 and E2. Site 295 would also be inconsistent with MNP policy NE1 due to surface water flood risks including on the site, Copper Lane, Howland Road and Thorn Road.

6) Poor sustainable transport connectivity with Maidstone and the surrounding area

For Site 314, there is a very limited daytime bus service along Albion Road, with no buses on Sundays. For Site 295, there is no bus service along Copper Lane, Howland Road or Thorn Road. For both sites, under the 'Access to Public Transportation & Services' assessment in the SLAA, the required mitigation measures are described as "unfeasible due to insufficient site scale to achieve increased bus service regularity, even when considered collectively with adjacent sites". Both sites are then described in the borough council's own words as "unsuitable on sustainability grounds." Page 178 of the Draft Preferred Approaches document requires that Copper Lane and surrounding roads be widened to provide bus access. Copper Lane is a single track country lane with no prospect of widening.

7) Limited local employment opportunities

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. 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.

8) Lack of capacity on the railway

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. Other large-scale housing developments in Staplehurst, Headcorn, Ashford and East Kent will also be putting increasing pressure on train capacity in future years. Marden station already has severe parking problems in a very constrained area, and as noted above, there are limited pedestrian links to Marden.

9) Sewerage, water and electrical supply concerns

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. 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. Marden also experiences frequent power cuts during thunderstorms due to weaknesses in the existing electrical supply network. Further details are given in Annexes B (Site 295) and C (Site 314), and attenuation is also drawn to the detailed objections to housing development on both sites submitted to the committee by concerned local residents.

Employment Site 286 – Land at Underlyn Lane

The Parish Council welcomes the omission of Site 286 (Land at Underlyn Lane) from the employment land options to be taken forward under the Borough Council's 'Preferred Approaches' consultation.

For the record, Site 286 was considered to be unsustainable and unsuitable for development for the wide range of reasons set out in Annex D, including:

- 1) Adverse impact on the open countryside contrary to Maidstone Borough Local Plan policy DM30
- 2) 55% of the site is located in flood zone 3
- 3) Economic development on this site would be variously inconsistent with aspects of MNP policies NE1, NE3, NE4, NE5, BE1, E1, A1, A4, In1 and In2
- 4) Constrained by very limited bus service and a lack of nearby facilities which would therefore entail increased traffic movements
- 5) Close proximity to Grade II listed property
- 6) Risk of pollution to the River Beult (SSSI)

Other housing, employment and mixed-use sites

The Parish Council supports the Borough Council's acceptance of the conclusions of the SLAA that the other proposed housing, employment and mixed-use sites in Marden should not be taken forward as part of the 'Preferred Approaches' consultation.

Local Plan Policy EMP1(2) - South of Claygate, Pattenden Lane, Marden

The Marden Neighbourhood Plan recognises the importance of sustaining a vibrant business economy and seeks to promote business interests where compatible with other policies in the plan. This accords with the aims of the National Planning Policy Framework (NPPF) that seeks to enable the sustainable growth and expansion of rural businesses, the development and diversification of agriculture and other rural businesses and enable sustainable rural tourism and leisure that respects the character of the countryside.

The Parish Council therefore looks forward to suitable proposals being submitted under Local Plan Policy EMP1(2) - South of Claygate, Pattenden Lane, Marden in the Plan Period, provided that they are also consistent with MNP policy E1 and other relevant NPPF, Borough and Neighbourhood Plan policies.

Yours sincerely

Alison Hooker
Clerk to Marden Parish Council