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David Burton
Chair, Strategic Planning Committee
Maidstone Borough Council

15 December 2019

Dear Mr Burton

Call for Sites Submission 226, Land North of Staplehurst

We have already complained about misleading information presented with this application, namely the implication, by means of arrows drawn up the map [page 16 paragraph 7 on the glossy brochure], that our land would be available for an extension to this scheme. We remain totally opposed to this, and know of two other landowners whose land is also designated by means of arrows, that are also opposed to any such move.

We wish now to present our formal objections to this scheme going forward. This appears to be an opportunistic, 'me too' jump on the Garden Village bandwagon which was probably thrown together by the applicants when the news of site 309 (strategic expansion of Marden) broke. We are opposed to that one, and also to this one.

Our main objections are based on the following:

1 Flooding

This land is low-lying, and presents a very high risk of flooding, as documented on the Staplehurst SWMP. In addition to this, the land also accepts drainage water from a large area which includes our land, both in Grave Lane and Summerhill Road, and also properties (including our own) in Summerhill Road (eg Dirt House, Allingham Oast, Burrs Oast, Allingham Barn, Allingham Cowshed, The Chalet, Radar House, Little Hickmotts, The Lodge, Little Crewden, Brooklands and Hill View) in both Summerhill Road and Grave Lane. In addition to this, a further stream runs through the land at Home Farm, which carries water that has come from our land off Battle Lane at Manor Farm, in addition to this, it accepts water from all of St Anne's Green (Battle Lane) where there are numerous properties, including the properties near Blue House Farm, some of them listed, and the Summer Hill hamlet properties (eg Toll Gate Cottage, Summerhill Cottages), plus Horlands and Westland Farms on Summerhill Road. All of these watercourses have a tendency to overflow and back up in times of wet weather. Indeed, the second stream through Home Farm frequently floods where it crosses Battle Lane, and also where it crosses Summerhill Road. It is hard to see how any potential flood mitigation measures (attenuation basins etc) that a developer could put in place could effectively mitigate the heightened risk of flooding to this wide area, and also to any newly built properties in the scheme close to the junction of the A229 and Chart Hill Road. Indeed, a recent flood alert for the River Beult (issued 15 November 2019, see attached) suggested that this scheme could potentially be flooded regularly. Indeed, when this scheme was discussed at the Marden Parish Council meeting, when I referred to the scheme as 'Atlantis' there was a general laugh from a roomful of people with a clearer idea of the problems of flooding in the area than a planning consultant based in London, or an ecological one in Hertfordshire. Come to think of it, they need a new name for the scheme to replace their inelegant LNOS, perhaps we've found the most appropriate one.

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Flooding is an issue that can only get worse with climate change, so this development in the floodplain of an important and protected river needs rejecting.

2 Ecological Matters and Landscape

Buried in the body of the ecological report is the admission that there are several stretches of ancient woodland which this scheme would swallow whole. It would also border other small parcels of ancient woods. Indeed, according to maps shown in Maidstone's 'A Revision of the Ancient Woodland Inventory for Maidstone Borough 2010-12' there is a network of small parcels of ancient woods running in a south easterly direction from Chainhurst to the other side of Cross at Hand, and in line with the River Beult just to the north. Both Staplehurst and Marden (where a lot of this scheme is actually sited) have a rich network of parcels of ancient woods and oak shaws. These shaws and our species-rich hedgerows add greatly to wildlife connectivity.

Also in the Ancient Woodland Inventory, it states: 'The revised Ancient Woodland Inventory will assist Maidstone Borough Council's planners in making decisions about development.....thus ensuring that the effects of any development proposals on ancient woodlands can be properly assessed and considered.' Also the report 'will help identify threats to this resource.' It also states that 'The Low Weald, whilst not heavily wooded in this borough, holds many small semi-natural woods which are key to the character of this landscape. Many of the woodlands in all of these areas are field shaws, belts of trees, or woodlands less than 2ha in size.' How can planners even consider turning land containing 3 parcels of ancient woods, which we're told by Maidstone's own document is a critical landscape feature of the area, into what is effectively a large housing estate?

Again according to Maidstone's own document, Maidstone is 18th out of 67 boroughs in SE England in the area of ancient woodland retained, which covers about 7% of the borough.

Natural England's NCA 121: The Low Weald describes this landscape as 'Field boundaries of hedgerows and shaws [remnant strips of cleared woodland] enclosing small, irregular fields and linking into small and scattered linear settlements along roadsides... Rural lanes and tracks with wide grass verges and ditches'. This irregular line of ancient woodland fragments typifies the area. The land next to the scheme where the applicant has put their 6th and 7th 'expansion' arrows on p16 of their brochure shows some of our land. It also shows that we already have great wildlife connectivity already with our own hedgerow and shaw network, which further connects with other ancient woodland further away.

What is frustrating about this scheme is that the land is such a great biodiverse site already, which is at risk if this scheme goes forward. The applicant landowner has put this land into a stewardship scheme, which has enhanced its provision for protected species. The hedgerow which borders Grave Lane to the north, and to the west of Little Crewden, is a particularly good example of a mixed species hedge which I believe to be an ancient hedge. Taking the indicator of age to be the number of woody species per 30m stretch of hedge x 100 = age of hedge in years, I monitored a stretch of hedge as follows: oak + hawthorn + blackthorn + field maple + willow + dogwood + spindle x 100 = 700 years, bearing in mind this measure is only accurate to within plus or minus 200 years. In addition to these species, the hedge also contains ash, bryony, hop, briar rose and bramble. This hedge helps maintain a substantial yellowhammer population plus many other birds.



In addition to this, the land is a network of small oak shaws and remnants of ancient woodland, The arable land is punctuated by ditches with wide bordering margins- the high number of ditches again reinforces the fact that the land lies very wet. This presents a number of different useful habitats. These have been further enhanced by the applicant's planting of a bird feed seed mix, thus further supporting the local bird population. All of which means that it is baffling that all this very good work will be threatened if the scheme goes ahead. The applicant has put in an ecological report to suggest that their scheme will support the local wildlife with increased plantings and other measures. It talks of many enhancements to wildlife: bats, water voles, otters, birds, all is grist to the mill of a bright new future in the Promised Land. However, the presence of so many new homes with all the associated knock on effects to wildlife (eg people, cars, dogs, loss of habitat and privacy, streetlighting, soil runoff, warming of the area) in addition to the clearance of large areas of the site plus associated construction activity over a long period (the scheme's promoter suggests it will be 11 years of this) will harm this very real and potent wildlife refuge. How can it not? The brochure states brightly 'new residents with immediate access to nature', this is great for them, but maybe not great for nature. It is clear that this could well be a great resource for bats, and there is talk of accommodating their needs. But really, how can their needs be catered for on a housing estate? And we're talking about ancient woodland here which no amount of 'new tree and hedgerow planting' can be a substitute for.

Any runoff from the site along the important tributary streams of the River Beult that run through the site threaten to damage this very vulnerable SSSI, which runs at its closest at about 400m from the scheme.

Incidentally, in the ecological report at 4.4.1 on the desktop study, it mentioned that the area was 'suitable for Hazel dormice. A single record was [sic] approximately 0.7km east of the western site boundary, beside Maidstone Road.' Does this actually mean one was found on the site itself?

It seems completely contrary to the public interest that the land is currently in a Stewardship Agreement with English Nature, which has obviously borne fruit in terms of the quality of habitat present. The Government would have rewarded the landowner for carrying out this work, and this would have paid many thousands of pounds of public money to the landowner during the term of the Stewardship Agreement. It is wanton waste to allow the same landowner to undo all this great conservation work by building houses on the site, even if the large amounts of greenwashing presented by the applicants in their submission documents comes to pass.

3 Transport

There is a lot of talk in the report about the Arriva No 5 bus, and whether this will run more than once an hour, and if it does it will help solve Maidstone's traffic congestion. This seems to be pie in the sky, and somewhat cynical pie too, as the report also suggests train commuters will need extra parking at Staplehurst train station as a result of this scheme. So the residents of Atlantis will not take the bus, walk or cycle a mile south to the train station (can't blame them, the road is brutal) but they will leap happily on buses to take them 7 miles into the bus station in Maidstone, a windswept hellish underpass in a shopping centre, and from where they will probably need to walk, or catch another bus to somewhere they might want to go. The reality of the situation is that most modern families have to get parents and children to school and work and home again in very limited timescales. Particularly when mothers have young children, many dash from nursery/primary school and onto work, and every day is a skin of the teeth operation to get from



A to B to C on time, and after school the process is reversed. Mothers work until the very last minute before jumping in the car to get to school/ nursery on time. In the cities, it is much easier to manage this frantic progress, but in the countryside it just does not work, hence the reliance on the car. When children move onto secondary school things are more relaxed, as children can then be semi-independent, but with young children, this is not the case.

And where will this extra car parking for Staplehurst station actually be? Already, there's an unofficial overflow car park for the station which has totally wrecked the verges of George Street, and made negotiating this (particularly during the current road closure in Marden Road) a hazardous exercise.

As to the bicycle route from the scheme to Maidstone, really? Has the person who suggested it actually tried it? Steeply uphill, on murderous narrow roads thick with traffic. I wouldn't be happy for any member of my family even to try it. According to the helpful brochure (that one that brought you fictitious opportunities to extend the scheme onto land not available to it) 'currently no cycle routes in close proximity to Staplehurst or Cross at Hand. However, the network of country lanes surrounding the village are considered to be suitable for leisure and commuting cycling.' Sure, the area has plenty of leisure cyclists at the weekends, usually in packs (some safety in numbers) but not in rush hour. Realistically, bicycle commuting to Staplehurst station will be uncommon, and to Maidstone, highly unlikely.

Also the idea that people in Staplehurst will be happy to jump on a bus out to Atlantis to visit the facilities there seems a far-fetched idea. Why would they bother? Even if, for the sake of argument, they did, wouldn't this just strip the life out of the centre of Staplehurst?

4 Something Missing?

There are large areas missing from this information. There is an opportunity for Maidstone to be the developer for this scheme. Is this because the applicants have failed to find a developer rash enough to take this project on, and have swerved the opportunity?

Also missing from the brochure was any clear idea of where residents of Atlantis might seek medical help. Healthcare provisions 'need to be discussed with bodies such as the Primary Healthcare provider' in other words, no idea on this one, next question please.

Educational ideas seem relatively vague too. Again, a couple of sentences and on to the next tick box issue.

Garden Village vs Rural Service Centre

There seems to be something wrong on a supposedly self-sufficient community being sited near a village that has transport and other facilities in it, and suggested this is the reason for this supposedly self-sufficient community is its proximity to a community it can parasitise. There is a strong likelihood of a main village with its zombie-like shadow to the north of it.

I have, in objecting to site 309, objected that this type of garden village is not an ecological way to solve the housing need of the country. A big chunk of useful land plus ancient woodland is to be swallowed up and turned into a big housing estate and netting the nation a mere 1800 homes. I see no sign of any future-proofing, as the details are so sketchy. This is basically a desktop



exercise by someone having a punt at realising a massive profit on their investment in land.
Another one for the bin, please.

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Cc Marden Parish Council

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