

Annex 1

Subject: 2019 MAIDSTONE BOROUGH COUNCIL 'CALL FOR SITES' PROCESS

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2019 MAIDSTONE BOROUGH COUNCIL 'CALL FOR SITES' PROCESS

I welcome the opportunity to give some early views to Marden Parish Council on the recent 'Call for sites' process. I understand that the deadline for responses is Friday, 29 November 2019.

Below I set out some context to my comments and then give some comment on potential sites.

Context

Back in 2013, when it became obvious that house building was one of the only instruments the then Coalition Government had to stimulate the economy, **and it was clear that Marden was going to face considerable land use change** – I wrote to the then Chancellor of the Exchequer and Secretary of State for Local Government, to widely-held concerns about Marden's future. Many other residents also expressed their dismay to the then proposed five large-scale housing developments and the impact that these would have on the community. The effects that we predicted at that point as a result of overdevelopment and a lack of infrastructure, have now come to fruition.

Over the last six years 573 new houses have been given planning permission in Marden, over five sites and 27.9 hectares (68.94 acres), many of which have now been constructed. This rate of build-out is unprecedented in Marden's history. One of the reasons these were enabled to proceed so quickly was the lack of the evidence of a five-year supply of housing in an agreed Maidstone Borough Council Local Plan. **Although there is now a Local Plan in place, the Government has revised upward the housing supply numbers ('Housing Delivery Test') resulting in a greater number of dwelling having to be built. A cynical person might say that the reason for the revision is so that the numbers can never be met, thus facilitating continuing development.**

It is surprising that Marden had not faced extensive development until the last six years, and perhaps that is why it is so difficult for residents, because for a long time Marden appeared to be protected. Change really started to take place in the early 1990's when the agricultural suppliers Suttons closed and the centre of the village was redeveloped. More recently, **Maidstone Borough Council (MBC) made the decision, that due to a range of factors - including the existence of the railway station, that Marden be designated as a 'Rural Service Centre' and thus opened it up for virtually continual future housing development.** Councillors have commented that the village is ideal to be expanded as it has the railway station in the centre and can in theory expand in all directions across the flat countryside. Landowners and developers think the same – the village is viewed as a huge potential building site. In fact, an assertion in a report to the MBC Planning Committee (16 October 2014) was that *"Marden is considered capable of absorbing the additional population"*.

However, **there is a concern that Marden is at a tipping-point, moving from being a sustainable village community to a small town, by stealth, with no planning as to how it should grow and what facilities it will require.** For example, the village has limited shops – with really only a couple of convenience stores, and there is a question over the capacity of the primary school and medical centre. Neighbouring Paddock Wood classes itself as a town and has only a slighter higher Ward population than Marden at circa 8,253 – but they also have many more facilities (including a supermarket) and it is in a far more accessible location – as are the communities of Staplehurst at a population of circa 5,947 and Cranbrook and Benenden Ward at circa 7,799.

The analysis that led to Marden being classed as a 'Rural Service Centre' (RSC) needs to be open to scrutiny - for example the existence of the railway station belies the fact that the village is not as accessible via the road network, compared to the other communities referenced, and also that many of the people who use the station do not actually live within the village, and come from the hinterland and other communities. For evidence of this you need only observe the railway car park and

surrounding streets (where commuters also park). The railway does not support local transport needs – it primarily services commuters into London, the bus service is poor, and it is a requirement to own a car in a rural community like Marden.

One of the issues with the progression of development is the fact that all the recent development sites in Marden have been developer-led/landowners-led and this is based purely on profit and not on building affordable houses for those genuinely in need. The process has not been council-led. To all intents and purposes, Maidstone Borough Council appears to have divested itself of its spatial planning responsibility.

One of the biggest issues with the current new large-scale housing developments in Marden is the lack of accompanying infrastructure. This has been a continuing issue stacking-up since the immediate post-war period. For example:

- **Roads**
- **The size of the current primary school**
- **The size of the surgery**
- **The inadequate retail facilities**
- **The lack of railway station car-parking**

MBC's 'Call for Sites' Background Information document states that – *"Those submitting sites...should actively consider how accessible the site is to key services and facilities...and how, if needed, this can be improved"*.

No one body is looking at the long-term impacts and what can be done to alleviate these issues. We need to be advocating an 'infrastructure first' approach. Many officials and residents are trying to ignore this fact, but these issues need addressing. **The issue is who will pay for these improvements, and Councils don't have the levels of funding required, so funding will have to be sourced from developers and central Government.**

One of the issues with planning gain from developers with recent sites in Marden is that although they appear large, they have not been large enough to yield the funding and improvements that the village so desperately requires to provide meaningful facilities for the existing and future residents. There is also the accusation that funds that have been allocated to the community have not been spent either.

So, in summary, **future development is unavoidable in Marden because:**

- **The housing pressures on the South East of England**
- **Central Government and Maidstone Borough Council policy**
- **Marden is on the Dover to London Charing Cross railway line, so will always be targeted for new housing.**
- **The perverse truth is that, further development is the only way that Marden is going to get the infrastructure it desperately requires, to future-proof it.**

For this to be addressed in a logical, pragmatic way, future development needs to be focussed in a single location and be planned in the way you would a new town or a 'garden community'. Adding sites of say 100/200 units every couple of years, scattered around the Parish, in an ad-hoc way will not give Marden the

infrastructure it so badly requires. It is also incredibly bad spatial planning. In short, making sure the appropriate infrastructure is in place (transport links, and community infrastructure like schools and healthcare facilities), or planned to be in place, and still preserve a 'sense of place'. **The question is where should this future new housing be sited?**

Marden 'Neighbourhood Plan', when adopted as supplementary planning guidance, should be used as primary guidance for future development and what facilities might be required. To prove that 'localism' and local democracy means something - ideally the 'Neighbourhood Plan' should be given the priority the 'Localism Act' promised, and/or there needs to be an Impact Assessment/infrastructure study on village growth, and what facilities particular growth would require prior to new development taking place.

309: LAND NORTH OF MARDEN

It is judged that this site is the most suitable for development, for the reasons set out below.

The draft Marden Neighbourhood Plan states that “future housing land allocations should be permitted wholly or partially located north of the railway line or in outlying settlements such as Chainhurst”.

In the 2012 'Call for Sites' Land at Church Farm, Maidstone Road, Marden (of which 309 forms part of) was proposed for new development and refused. This site is north of the railway and has now been expanded and promoted as a 'garden community', with a projected plan to construct in the region of 2,000 houses with associated infrastructure.

If it had not been for the railway coming to Marden in the 1800's Marden would have naturally grown and flowed from the Parish Church in all directions. In recent years it has been non-sensical that Maidstone Borough Council imposed the railway line as a planning demarcation line and opposed any housing development above this. It recently, successfully, opposed the development of the Marden Turf site as it was able to demonstrate it had sufficient housing numbers in its Local Plan. I strongly suggest that without this Plan, it would have been difficult to oppose this site being built on, not just because of the numbers, but also because with the construction of the new Marden Sports Centre, and the new clubhouse (MA/11/0361 - <http://planning.maidstone.gov.uk/swiftlg/apas/run/WPHAPPDETAIL.DisplayUrl?theApnID=11/0361>), the long-held demarcation planning line has been breached, which has set a precedent.

The south of Marden (e.g. below the railway line) is starting to reach saturation point in terms of new housing, certainly at the pace it has happened in the last couple of years, and the infrastructure e.g. the roads, surface water issues and flooding, and sewerage are significant issues. My view is that some development needs to be countenanced above the railway line. I say this because new development should decant onto major roads, not minor roads like lanes, and the majority of the new development in Marden should always have been adjacent to the industrial estate along Pattenden Lane which extends north of the railway line or Maidstone Road, so that traffic quickly moves away from the centre of the village. The fact that it hasn't, appears to be a purely political decision, based on an unclear criterion.

- From a planning viewpoint it is hard to argue against site 309: 'Land North of Marden'.
- The site has several clear advantages:
 - o It is accessed from the main road into/out of Marden – the B2079, Maidstone Road, which is the natural route to the M20.
 - o It could also be accessed via the other main road into the village – Pattenden Lane, which hosts the Industrial Estate.
 - o The site could also be accessible from the railway, opening the possibility of a new entrance and car park – given that the existing one has reached capacity.
 - o You could also combine new housing with a new school – given that the community will grow. The new school could also easily access to the new sports facility on the other side of the B2079.
 - o It would also give the opportunity for a completely new housing area with new infrastructure (roads, sewerage etc.), in an area that is drained particularly well given it is currently used to grow turf, &
 - o Importantly, it would be a distinct, planned, community and not place pressure on the existing village community, which the recently tacked-on developments have.
 - o This type of development has the advantage of being able to be planned over several years with related funding to achieve the required infrastructure which would be required with a development of this scale.
- At the first Marden Neighbourhood Plan Steering Group Open Day - 32 stated they were in favour of this site, with 9 against. The result might be slightly different today, but this would be because of the scale of development that has taken place since.
- It is my contention that the view that there should be no development to the north of the railway line is totally unrealistic and unsustainable in the context of the whole village. The figure of 2,000 may be too high a figure, but the planning principle of development north of the railway line in Marden is sound and pragmatic.

314: LAND EAST OF ALBION ROAD
295: LAND NORTH OF COOPER LANE

These two applications need to be examined together, as they are being made in parallel.

It is judged that these sites are least suitable for development, for the reasons set out below.

314: LAND EAST OF ALBION ROAD

It is judged that this site is least suitable for development, for the reasons set out below.

I have used the Completed Call for Sites Submission Forms as a basis for my responses/comments.

The comments for this site need to be taken into account along with those for 295: LAND NORTH OF COOPER LANE as the two applications are being made in parallel and have aspects in common.

Highways

- It is stated that *"Safe and suitable access can be achieved from Albion Road to the west of the proposed site in the form of a simple priority junction. This is in keeping with the character of Albion Road and the same junction form as the newly constructed access serving the consented development of 124 dwellings on the former Marden Cricket and Hockey Club land [H1(46)] immediately to the north of this proposed site"* (25: Accessibility: Access).
- In terms of traffic impact it is stated that - *"The Transport Statement (May 2019) ...identifies and assesses the impact of increased traffic generation resulting from an additional 60 dwellings on the local road junctions. It concludes that there would be a very modest level of traffic generation. There are no current junction capacity issues and the junctions are operating with spare capacity. As such it is anticipated that the proposed development traffic can be accommodated on the local highway network without 'severe' impacts, in accordance with the requirements of the revised National Planning Policy Framework"* (27: Tangible and infrastructure constraints Traffic impact).
- The National Planning Policy Framework (NPPF) [Paragraph 109] states that – *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"*.

The visibility splays of new entrance would be a concern, as it would be very close to a dangerous corner (Albion Road/Thorn Road/Plain Road), and the only way to ensure a safe access would be to remove large portions of the hedgerows which give the site it's rural character.

The Albion Road/Thorn Road/Plain Road junction is a known hazard, with traffic turning out of Plain Road onto Albion Road having very restricted visibility.

- The applicants 'Transport Statement' states that – *"Personal injury accident (PIA) date has been obtained from Crash Map for the most recently available five-year period. The study area covers Albion Road and its priority junctions with Roundel Way, Stanley Road and Plain Road. The date shows that there have been no recorded injury accidents during the five-year period and as such it can be seen that the local highway network in the vicinity of the proposed development site is operating safely"*.

By far the most concerning aspect of the traffic related issues is of the undoubted increase in traffic due to this, and other proposed developments.

There have been several cars in ditches in Thorn Road, that are not referred to. One notable accident concerned a car disintegrating a refuse bin while swerving to avoid another car – this instead of slowing down. I have to say that the speed of traffic along Thorn Road/Albion Road is becoming a cause

of concern – which we believe is due to drivers using Thorn Road and then Copper Lane (which is unsuitable for heavy traffic) as short cut instead of using the designated Howland Road which is often difficult to transverse due to cars being parked along the entrance to it from Marden village.

- The 'Transport Statement' also states that – “...site visits have revealed that there is the potential to introduce a new footway on the eastern side of Albion Road, connecting the proposed site with the new footway on the eastern side of Albion Road (currently under construction) to the north of the access for the new development situated to the north. This would provide a continuous footway link into the village centre. This would offer a benefit to existing and future residents in south-eastern Marden”.

New pavements/footways in this location are unnecessary and would change the character of the rural lane into an urban environment.

- The 'Transport Statement' also concludes that – “The proposed development is predicted [to] generate 31-34 two-way vehicle movements in each of the morning and evening peak hours, which equates to approximately one additional vehicle movement on the local highway network every two minutes. This is a very modest level of traffic generation”.
- The 'Transport Statement' also asserts that – “there are no current junction capacity issues and that the junctions are operating with spare capacity. As such it is anticipated that the proposed development traffic can be accommodated on the local highway network without severe impacts”

You cannot call the additional vehicular movement from what could be 160 new houses a “modest level” given the recent cumulative increased traffic from two other new developments. The traffic survey also does not model the cumulative proposed 100 vehicle movements from the connected site of 100 units, only the 60 for the first part of the proposal.

Flood risk

- The application site is may not be liable to surface water flooding. However, the ditches southward at the junction of Thorn Road and Copper Lane, and along Copper Lane, frequently overflow and the fields abutting both sides of Copper Lane are often saturated as a result of run-off from further up-hill. Building on the former Cricket and Hockey Club site and the proposals for 314: LAND EAST OF ALBION ROAD & 295: LAND NORTH OF COOPER LANE, has and will result in additional surface water flooding.
- The original planning application for the former Cricket and Hockey club site proposed a Sustainable Drainage System (SuDS) “to reduce runoff rates and mitigate against the impact of increased runoff volumes” is installed. This was to comprise an attenuation system comprising ‘swales’ and two interconnecting basins to mitigate against surface water run-off, and a pumping station to be located at the far southeast corner of the site discharging into a manhole located in Roundel Way – which is around 80 metres to the north-west of the proposed site.

- If a pumping station is to be built to carry the forecast surface-water run-off from the site to a point far north-west of the site – does this not indicate a significant issue with the drainage of this site and the surrounding area?
- If an application was to proceed, there would need to be significant ground work to ensure that not only the site itself is not subject to surface water flooding, but that neither are the existing properties in the vicinity.

Density

- The housing density on the former Cricket and Hockey Club site, is an inappropriate slab of housing for the edge of a rural settlement and not one that just be repeated.
- I would argue that due the sparsity of the existing environment and the open countryside, the density of the proposed housing is inappropriate on an edge of village location.

295: LAND NORTH OF COOPER LANE

It is judged that this site is least suitable for development, for the reasons set out below.

I have used the Completed Call for Sites Submission Forms as a basis for my responses/comments.

The comments for this site need to be taken into account along with those for 314: LAND EAST OF ALBION ROAD, as the two applications are being made in parallel and have aspects in common.

Site characteristics

- The Completed Call for Sites Submission Forms states that *"The proposed development site is contained by Copper Lane to the South but is effectively surrounded by countryside on all four sides. It does not adjoin the Settlement boundary for Marden". "The land is generally flat, sloping gently from north to south" (19: Description of site characteristics).*

The proposed site lies outside of the Settlement Boundary for Marden, is in open countryside and should not be countenanced for development without being promoted with 314: LAND EAST OF ALBION ROAD. It is disingenuous to suggest otherwise.

The sloping aspect of the site presents an issue in terms of surface water flooding risk, please see below.

Flooding

- It is also stated that - *"Surface water drainage is not likely to be a constraint. Following initial investigations, it is considered that SW can be managed on-site with an attenuation system controlled to the existing rate of greenfield run-off, with access to an existing surface water pipe on-site which in turn connects to a pond/watercourse. A suitable drainage strategy which incorporates SUDS can be delivered" (27: Tangible and infrastructure constraints).*

The application site is may not be liable to surface water flooding. However, the ditches southward at the junction of Thorn Road and Copper Lane, and along Copper Lane, frequently overflow and the fields abutting both sides of Copper Lane are often saturated as a result of run-off from further up-hill. Building on the former Cricket and Hockey Club site and the proposals for 314: LAND EAST OF ALBION ROAD & 295: LAND NORTH OF COOPER LANE, has and will result in additional surface water flooding.

The original planning application for the former Cricket and Hockey club site proposed a Sustainable Drainage System (SuDS) *"to reduce runoff rates and mitigate against the impact of increased runoff volumes"* is installed. This was to comprise an attenuation system comprising 'swales' and two interconnecting basins to mitigate against surface water run-off, and a pumping station to be located at the far southeast corner of the site discharging into a manhole located in Roundel Way – which is around 80 metres to the north-west of the proposed site.

If a pumping station is to be built to carry the forecast surface-water run-off from the site to a point far north-west of the site – does this not indicate a significant issue with the drainage of this site and the surrounding area?

If an application was to proceed, there would need to be significant ground work to ensure that not only the site itself is not subject to surface water flooding, but that neither are the existing properties in the vicinity.

Highways

- It is stated that - *"If the site were to be included as part of a comprehensive development proposal with land east of Albion Road to the north then safe and suitable access could be achieved from Albion Road"* (25: Accessibility).

By far the most concerning aspect of the traffic related issues is of the undoubted increase in traffic due to this, and other proposed developments.

The visibility splays of new entrance onto Albion Road would be a concern, as it would be very close to a dangerous corner (Albion Road/Thorn Road/Plain Road), and the only way to ensure a safe access would be to remove large portions of the hedgerows which give the site it's rural character.

The Albion Road/Thorn Road/Plain Road junction is a known hazard, with traffic turning out of Plain Road onto Albion Road having very restricted visibility.

This said access from Cooper Lane would not be sensible either. Copper Lane is a single-track rural lane which is unsuitable for heavy vehicles and or significant traffic flows.

Thorn Road/Cooper Lane junction is unsafe. There is a dangerous bend in the road, bordering this site heading toward Staplehurst. In addition, the Cooper Lane/Thorn Road junction has restricted visibility for vehicles in all directions.

Drivers do not currently adhere to the 30mph speed limit on Thorn Road and Copper Lane is subject to a derestricted speed limit. The speed limit needs to be enforced on Albion/Thorn Road.

There have been several cars in ditches in Thorn Road, that are not referred to. One notable accident concerned a car disintegrating a refuse bin while swerving to avoid another car – this instead of slowing down. I have to say that the speed of traffic along Thorn Road/Albion Road is becoming a cause of concern – which we believe is due to drivers using Thorn Road and then Copper Lane (which is unsuitable for heavy traffic) as short cut instead of using the designated Howland Road which is often difficult to transverse due to cars being parked along the entrance to it from Marden village.

Sewage

- It is stated that - *"This proposed development site would be able to make connection with all utilities as part of a wider development proposal with land east of Albion Road" (Utilities); and that – "An existing 150mm diameter public foul sewer is located in Albion Road. This sewer is of sufficient size to accommodate the number of dwellings on the proposed development site"*.

There are significant issues with connecting into sewage facilities to the north of the site. Mainly as these are uphill of the site and may require pumping. Thought should be given into the construction of, or linking in with, facilities to the south of the site as what is essentially being proposed is lazy and unsustainable in the long-term.

Heritage

- The comments from the Maidstone Borough Council Conservation Officer should be discounted as they appear to be copied from the former Cricket and Hockey Club application (26: *Policy constraints*).

269: LAND EAST OF COOPER LANE [Cooper Lane Pasture]

I have used the Completed Call for Sites Submission Forms as a basis for my responses/comments.

Planning history

- In the 2012 MBC Call for Sites this field was put forward for housing or a secondary school. It was given the reference number HO-115. It was not accepted in the MBC Local Plan 2017 (22: *Relevant planning history*).

It was refused for being outside of the existing village envelope/boundary, as defined in the Draft Marden Neighbourhood Plan; that it is in open countryside and development would affect the rural aspect of this entry/exit into the village.

Highways

- It is stated that – *"the site enjoys good access to the B2079 Maidstone Road via Thorn Road, Albion Road and High Street, which have a good crash record" (19. Description of site characteristics).*

- It is also stated that *"site access will require careful location and design. The recently extended 30mph road speed limit on the Thorn Road boundary may require further extension up Cooper Lane. Consideration should also be given to the provision of footways or cycle lanes on Thorn Road and Albion Road. The usual utilities connections and upgrades will be necessary"* (37: *What if any measures may be required to make the site viable for the development proposed?*).

By far the most concerning aspect of the traffic related issues is of the undoubted increase in traffic due to this, and other proposed developments.

There have been several cars in ditches in Thorn Road, that are not referred to. One notable accident concerned a car disintegrating a refuse bin while swerving to avoid another car – this instead of slowing down. I have to say that the speed of traffic along Thorn Road/Albion Road is becoming a cause of concern – which we believe is due to drivers using Thorn Road and then Copper Lane (which is unsuitable for heavy traffic) as short cut instead of using the designated Howland Road which is often difficult to transverse due to cars being parked along the entrance to it from Marden village.

- It is stated that the *"existing field gate access to Cooper Lane and two former road accesses from former dwellings, one to Cooper Lane and one to Thorn Road – all three marked on attached map"* could be used for access to the site (24: *Accessibility*).

Copper Lane is a single-track rural lane which is unsuitable for heavy vehicles and or significant traffic flows.

Thorn Road/Cooper Lane junction is unsafe. There is a dangerous bend in the road, bordering this site heading toward Staplehurst. In addition, the Cooper Lane/Thorn Road junction has restricted visibility for vehicles in all directions.

Drivers do not currently adhere to the 30mph speed limit on Thorn Road and Copper Lane is subject to a derestricted speed limit. The speed limit needs to be enforced on Albion/Thorn Road.

The visibility splays of new entrances would be a concern, as they would be very close to a dangerous corner, and the only way to make safe access would be to remove large portions of the hedgerows which give the site it's rural character. Given the bend in Thorn Road and the unsuitability of Cooper Lane, the site should be ruled out on access alone. The applicant refers to a 17th century building that once occupied the Cooper Lane/Thorn Road corner, as proof of safe access. It has to be pointed out that when this property was standing, the highway was more of country lane, with virtually no vehicular traffic. The context has totally changed by today's standards.

Flood risk

- Flood risk – it is stated that the site is in Flood Zone 1 – *"very low flood risk from river and from surface water"* (26: *Tangible and infrastructure constraints*).

The application site is liable to surface water flooding. The ditches at the junction of Thorn Road and Copper Lane, and along Copper Lane, frequently overflow and the fields abutting both sides of Copper Lane are often saturated as a result of run-off from further up-hill. Building on the former Cricket and Hockey Club site and the proposals for 314: LAND EAST OF ALBION ROAD & 295: LAND NORTH OF COOPER LANE, has and will result in additional surface water flooding.

The original planning application for the former Cricket and Hockey club site proposed a Sustainable Drainage System (SuDS) *"to reduce runoff rates and mitigate against the impact of increased runoff volumes"* is installed. This was to comprise an attenuation system comprising 'swales' and two interconnecting basins to mitigate against surface water run-off, and a pumping station to be located at the far southeast corner of the site discharging into a manhole located in Roundel Way – which is around 80 metres to the north-west of the proposed site.

If a pumping station is to be built to carry the forecast surface-water run-off from the site to a point far north-west of the site – does this not indicate a significant issue with the drainage of this site and the surrounding area?

If an application was to proceed, there would need to be significant ground work to ensure that not only the site itself is not subject to surface water flooding, but that neither are the existing properties in the vicinity.

Density

I would argue that due the sparsity of the existing environment and the open countryside, the density of the proposed housing is inappropriate on an edge of village location.

The housing density on the former Cricket and Hockey Club site, is an inappropriate slab of housing for the edge of a rural settlement and not one that just be repeated.

IF FURTHER PROPOSALS ARE INCLUDED IN A REVISED MBC LOCAL PLAN, MBC SHOULD CONSIDER THE FOLLOWING:

- Building type and location
- 'Affordable Housing' provision
- Flooding & Drainage
- Sewage
- Highway issues

BUILDING TYPE AND LOCATION

- Recent new development is of a cul-de-sac design which should be avoided, as it does not lend itself to blending in with the village as a whole – it neither promotes a Wealden village design, which Marden is, nor a traditional street pattern. It is almost a community within a community - building the view that Marden is moving from a village to more of an urban environment.

- The density of new development in countryside settings should be much sparser than has been the recent practice.
- Two storeys should also be the maximum height for development in a countryside location.

'AFFORDABLE' HOUSING

- A key issue with new development is 'affordable' housing. Marden Parish Council have for a long time acknowledged this need, and as Marden grows this need will be even more pertinent to keep a balanced community.
- A key issue with new development is 'affordable' housing. The 2013 Growth and Infrastructure Act allows developers to challenge the Secretary of State for Communities (via a 'Viability report') the amount of affordable housing attached to housing schemes, if they think this is making them uneconomic to build. This is a concern as there is no certainty that the basis on which a development is granted will still be the case when it is built. This is one of the reasons why specific 'affordable' housing schemes are required in Marden.

FLOODING & DRAINAGE

- Many of the proposed sites in Marden are liable to surface water flooding.
- The planning solutions that have been devised, for example for the former Marden Cricket and Hockey Club site, to take into account surface-water drainage, have been on the basis of a 1:100 year weather event. However, as has been evident from the last 20 years the increase of wet and stormy winters is becoming more and more frequent, which is an indication of a change in our weather conditions and increased climate change. This is not a unique issue, as the majority of the village, apart from the historic village centre is prone to localised flooding, and safe dry access is not always possible into Marden – as roads into the village are often flooded during the winter. As the former Cricket and Hockey Club applicants 'Landscape and Visual Impact Assessment' stated – *"Generally the area around Marden is low lying and gently undulating between 20m AOD and 30m AOD. The most common geology throughout the area is Wealden Clay. Soils are generally heavy, deep, fertile loams, silts and clays but they are often seasonally waterlogged with ponds, watercourses and ditches being common throughout the area"*.
- The 'Flood and Water Management Act 2010' (Section 9) (http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf) defines flood risk as meaning *"risk from - (a) surface runoff, (b) groundwater, and (c) ordinary watercourses"*. The Act also details that Sustainable Drainage Systems (SuDS) should be provided for in new developments and be a deciding factor in determining a planning application. Under Schedule 3 ('Sustainable Drainage') of the 'Flood and Water Management Act 2010' *"Sustainable drainage" means managing rainwater (including snow and other precipitation) with the aim of - (a) reducing damage from flooding, (b) improving water quality, (c) protecting and improving the environment, (d) protecting health and safety, and (e) ensuring the stability and durability of drainage systems"*.
- Providing Sustainable Drainage Systems (SuDS) for all new developments should be a deciding factor in determining planning applications. But in doing so,

this should ensure that this does not just provide mitigation for the new development – but also for existing properties.

SEWAGE

- There are long-standing issues with the sewerage systems in Marden, in fact this has been one of the issues that has constrained the over development of Marden in the past, as another planning application's supporting documentation recently concurred – *"it is probable that there will be insufficient capacity within the existing network for this development and it will be necessary for Southern Water to advise on the upsizing required"*. This just illustrates that Marden village does not really have the infrastructure capacity for the pressures being placed upon it.

HIGHWAY ISSUES

- As far back as 1973 Kent County Council was of the view that the local road network in Marden was not capable of supporting the growth in traffic that development on the scale that is now being proposed would generate – *"The benefits to the village and the region to be derived from planned large-scale growth or piecemeal growth are too uncertain to override the environmental disadvantages inherent in the loss of village status, the social and physical stresses likely to arise, particularly in respect of facilities such as road capacity", and "the existing road pattern...is likely to stay and as a result, special care needs to be taken, not to overload this network more than is necessary to ensure Marden's stability and prosperity"* (Marden Village Informal District Plan, Kent County Council 1973). Nothing has materially changed with the layout and design of the road network in the last 41 years. The reality is that there has been no investment in updating the infrastructure that is required to take additional housing.
- Maidstone Borough Council should impose a 30 mile per hour speed limit on all roads within the Marden village settlement – to prevent cars speeding along our country lanes and causing avoidable accidents – as a consequence of the cumulative traffic increase as a direct result of the large number of new housing being given planning permission.

I am copying in all those who are elected to represent the village.

Yours faithfully,