

Strategic Planning  
Maidstone Borough Council  
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**Date: 17<sup>th</sup> December 2020**

Also sent to:  
Borough Councillors David  
Burton and Annabelle Blackmore  
Helen Grant MP  
County Cllr Eric Hotson

Dear Sir / Madam,

Marden Parish Council is pleased to respond to Maidstone Borough Council's Local Plan Review: Regulation 18b Preferred Approaches Consultation 2020.

**A) Detailed Site Allocation Policies LPRSA295 – Land North of Copper Lane / LPRSA314 – Land East of Albion Road**

The Parish Council does not agree that the adjacent 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, and under the 'Access to Public Transportation & Services' assessment in the Strategic Land Availability Assessment (SLAA) it is stated that the *"required mitigation measures unfeasible due to the requirement for 3rd party land, or the requirement to remove existing resident parking (with no apparent alternative) [in] order to achieve suitable road widths."* Both sites are then described in the borough council's own words as *"unsuitable on access grounds."*
- 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 which are already frequently congested.
- 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.
- 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 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, In4, 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.”*

### 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 – leaving aside the current coronavirus restrictions – 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 from either site to Marden station.

#### 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.

#### 10) Detailed comments on each site

Further details are given in Annexes A (Site 295) and B (Site 314), and attention is also drawn to the detailed objections to housing development on both sites submitted to the committee by concerned local residents.

#### 11) Proposed conditions

The Parish Council also wishes to comment on the proposed conditions for these two sites put forward in draft policies LPRSA295 and LPRSA314.

- Widening Copper Lane is not feasible without irreversible harm to its character and setting in the landscape, as noted in point 3) above. It is a narrow, single track country lane, with ditches and ponds on both sides of the road.
- It is not feasible for Copper Lane to be used as a bus route for the reasons noted in 3) and 6) above plus, at the northern end, it joins Howland Road which is also unsuitable as a bus route due to the road constraints at Rose & Crown Cottages.
- Widening surrounding roads is not feasible because:
  - Thorn Road and Plain Road are country lanes, with ditches and hedgerows and private land on either side. It would not be cost effective to purchase the land required to widen these roads.
  - Albion Road is residential with private land on both sides of the road. It would not be cost effective to purchase land required to widen this road.
- The capacity of Albion Road is heavily constrained by on-street parking. The removal of resident parking in Albion Road will only add to congestion in other parts the village as those residents do not have off-road parking, as noted in point 2) above.

#### 12) Sustainability Appraisal

Marden Parish Council comments as follows in respect of Sites 295 and 314 contained in the 'Interim Sustainability Appraisal of Maidstone Local Plan Review – Regulation 18b Consultation' report:

- i) Under SA objective 2: Services & Facilities, it is noted that both sites are distant from the nearest secondary school and average commuting distances from these locations are high. With the nearest secondary schools being located in Maidstone, Paddock Wood, Tonbridge and Tunbridge Wells, and as noted under point 7) above commuting to London by train is likely to be the only choice for many, this is certainly true, and to the extent that the assessment should probably be '--' overall when compared with other locations in the borough with significantly shorter travel distances.
- ii) Under SA objective 3: Community; it is stated that "Minor positive effects are expected from both site-specific allocation policies because of the requirement... for landscaping

to soften views from surrounding areas”, but this does not appear to be a valid ground for consideration under this heading and thus the assessment should probably be ‘0’ overall.

- iii) Under SA objective 4: Health; Site 295 is not located any closer to existing open space or the public rights of way network than Site 314, and in both cases, this is not offset by provisions in the site-specific allocation policies to the extent that the assessment should be higher than ‘0’ overall.
- iv) Under SA objective 7: Sustainable Travel; the ‘+’ assessment for both sites is disputed because:
  - a) pedestrian links to the village centre and station are poor and difficult to improve;
  - b) there are no cycle-friendly routes in the vicinity;
  - c) existing bus services are limited during weekdays and non-existent in the evening and on Sundays / bank holidays and any suggested improvements may never materialise;
  - d) existing peak train services are essentially full to capacity already.*NB – Points b) to d) also apply to Marden as a whole under Policy SP6(d).*
- v) Under SA objective 12: Flooding; the assessment of ‘-’ for Site 295 is too high because it ignores the effects of surface water flooding on the proposed vehicular access route via Copper Lane and should be reduced to ‘--’.
- vi) Under SA objective 13: Climate Change; the assessment should probably be ‘--’ overall as for SA objective 2.
- vii) Under SA objective 14: Biodiversity, the assessment for Site 295 should be reduced to ‘--’ and that for Site 314 to ‘-’ for the reasons given in point 4) above.
- viii) Under SA objective 16: Landscape; the assessment values in Table 6.11 do not align with the descriptions in paragraph 6.170, with the former being considered more accurate for the reasons given in point 3) above.

### 13) Conclusions

Detailed Site Allocation Policies LPRSA295 (covering Site 295) and LPRSA314 (Site 314) should not be included in MBC’s Preferred Approaches document for the reasons given above.

### **B) ‘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 C including:

- 1) The development offers no benefits to the existing community
- 2) Lack of cohesion with the existing community due to severance caused by the 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

**C) 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.

**D) Existing 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 existing 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.

**E) Spatial Strategy, Spatial Strategic Policies and Policies Map**

The Parish Council raises a number of comments and suggestions on the proposed Spatial Strategy, spatial strategic policies and policies map in Annex D attached, and particular attention is drawn to the following.

- i) Policies LPRSA295 (covering Site 295) and LPRSA314 (Site 314) should not be referenced in policy SP6(d) (formerly SP9) – see above.
- ii) In point 4) a) of policy SP6(d), the railway station enhancements should be specifically noted as additional car parking and step-free access to the ‘down’ platform as indicated on page 35 of the Marden Neighbourhood Plan
- iii) In point 4) of policy SP6(d), an extra ‘key infrastructure requirement’ “*e) Measures to reduce, manage and mitigate river, surface water and sewer flooding*” should be added. In addition to more frequent and severe river flooding, a significant worsening of surface water and/or sewer flooding from individual and combined events has been experienced across the parish in recent years. Any new development – of whatever size – in Marden therefore must take specific account of river, surface water and sewer flooding and contribute appropriately to the funding of the infrastructure measures required to reduce, manage and mitigate such events.
- iv) In respect of policy SP6(d), it noted that the ‘HRS Screening Report’ states in Appendix C that “this policy will result in the development of 145 new homes alongside 1000 new homes as part of the Neighbourhood Plan” in error. This reproduces the Policy SP6(c) text for Lenham and should instead read “this policy will result in the development of 113 new homes.”
- v) Should policy SP9 (formerly SP17) be adopted, a review of the extent of the Low Weald landscape of local value should be undertaken because the local landscape character areas ‘44 Staplehurst Low Weald’, ‘45 Sherenden Wooded Hills’ and ‘57 Teise Valley’, as defined in the ‘Maidstone Landscape Character Assessment’ (2013), are all rightly placed in the ‘Conserve’ category and thus require additional protection as part of an extended definition.

- vi) In point 4) of policy SP13(a) (formerly ID1), it should be made much clearer that the indicative list of priorities for Section 106 developer contributions can be varied to include specific infrastructure measures required to support policies SP1 to SP10 (e.g. measures required to support an amended policy SP6(d) to reduce river, surface water and sewer flooding in Marden).
- vii) Additionally, should policy SP13(a) be adopted, a review of the Infrastructure Delivery Plan should be undertaken to ensure that the priorities for Community Infrastructure Levy payments also align with these priorities (as varied to support policies such as SP6(d), etc.).
- viii) Should policy SP15 (formerly DM1) be adopted, the further action on page 19 of the Marden Neighbourhood Plan (MNP) a Conservation Area Appraisal and Management Plan for Marden should be undertaken by MBC in light of the National Planning Policy Framework, latest Historic England guidance, etc.
- ix) In respect of the policies map, the following further actions on pages 36, 42 and 43 of the Marden Neighbourhood Plan should be completed as part of the Local Plan Review:
  - To modify the map to encompass the major Highwood Green housing development given planning permission in 2012 and completed in 2017 within the settlement boundary.
  - To modify the map to encompass the light industrial/vehicle repair site at the western most part of the Pattenden Lane industrial/commercial area within the economic development area.
  - To modify the map to show the Church Green part of the Marden district centre.
  - To modify the map to extend the High Street part of the Marden district centre south east to include the Village Club, Stanleys Garage and Marden Tandoori.

#### **F) Development Management Policies**

The Parish Council raises a number of comments and suggestions on the proposed development management policies in Annex E.

#### **G) Additional comment**

The Parish Council notes that there is an error on pages 255 and 266 – Policies LPRSA066 - Land East of Lodge Rd and LPRSA114 – Land at Home Farm should be listed under a ‘Staplehurst Site Allocations’ heading as they are not located in the parish of Marden.

Yours sincerely

**Alison Hooker**  
**Clerk to Marden Parish Council**