

**Maidstone Borough Local Plan Pre-Submission (Regulation 19) Representations
CPRE Kent representation on Regulation 19 para and policies**

CPRE Kent is the Kent Branch of the Campaign to Protect Rural England which is part of the national CPRE charity. It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone and we believe the planning system should protect and enhance the countryside in the public interest for the important contribution it makes to peoples' physical and mental wellbeing, as well as its vital role in feeding the nation. It is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

The following representations reflect CPRE Kent's earlier submissions. We would like them to be forwarded to the Inspector.

Key local issues (page 10)

CPRE Kent generally agrees with the key local issues listed.

We are concerned that the proposals in the Plan will actually have a negative effect on some of these issues. For example we consider that the scale of the proposed development at the Rural Service Centres and in the larger villages will not help to maintain the distinct character and identity of the villages (issue 2), and that the overall amount of development proposed will not result in improvements to the quality of air within the AQMA (issue 5).

We consider that an additional key issue should be included that recognises the importance of the countryside in general for farming and recreation and the need to maintain a functional relationship between town/village and the countryside. It is the countryside that binds the Borough's communities together.

Spatial vision (page 12)

CPRE Kent generally agrees with points 1, 3, 6, 8, and 9 of the vision, but we would make the following comments on other points:

Bullet 2 states that development will be guided by inter alia the delivery of the Integrated Transport Strategy. The draft Integrated Transport Strategy has only just been published (February 2016) and it is understood that the Strategy does not have the endorsement or approval of Kent County Council or the Joint Transportation Board.

Bullets 4: We would question what is meant by '*suitable development*' at the rural service centres and in what way it will reinforce their role. We can find no evidence that demonstrates what quantity and type of development at each of the rural service centres is '*suitable*' and in what way it would reinforce their role. The proposed development for the Rural Service Centres is disproportionate to their existing size and does not respect their rural setting. Rather, it seems to be the case that sites have been selected to help meet the proposed development targets, principally housing, and it is simply assumed that this new development will support and help maintain existing services. The sites have not been selected on the basis of any clear criteria as suggested in the vision.

Bullet 5: Whilst the wording is slightly different to that used in point 4, the vision of the purpose of development at the larger villages is essentially the same as that at the rural service centres. Again, we would suggest that this is a convenient justification for development in the larger villages rather than according with any evidence of need to maintain any services. Where is the evidence to show that the services are actually failing in these villages and that their continued existence needs more development to support them.

Bullet 6: We agree with the overall vision.

Spatial objectives (page 13)

CPRE Kent has the following comments on the objectives:

Bullet 2(i): We fully agree and support the objective of focusing development within the Maidstone urban area, although disagree at the extent of residential development proposed at the strategic development locations (SP2 and SP3), and do not agree with inclusion of Junction 8.

Bullet 2(ii): Whilst we agree that there is scope for some development at the rural service centres we are extremely concerned that the scales of development proposed at the rural service centres (increases of around 28%) will overwhelm their existing character. We also consider that Harrietsham should not be designated a rural service centre, as we explain in more detail later in this response.

Bullet 2(iii): Whilst we agree that there is scope for some development at the larger villages. In the case of the larger villages development potential should be expressed as '*very limited*'. We do not agree that Yalding should be defined as a larger village or that strategic development locations should be identified.

We consider that in setting this spatial distribution the objective should also emphasise the opportunities to use previously developed land to secure urban regeneration.

We also consider that, as an objective of the Plan, support should be given to the role of Neighbourhood Plans in identifying development opportunities in the rural service centres and larger villages.

Bullet 4: We agree with this objective, and consider that it should be expanded to ensure that services are retained at all the rural settlements and not just at the rural service centres.

Bullet 5: CPRE Kent is concerned that the settlement hierarchy is incomplete and that it should be extended to include the villages that fall below the larger villages. This would include those settlements for which village boundaries have been defined and to which spatial objective 5 relates. It is likely that such villages will also provide opportunities for infill development, and thus contribute towards the windfall allowance that we suggest.

Also, and to complete the hierarchy, the final category should include 'the countryside' and the many very smaller rural communities for which no settlement boundary is defined and where development will not generally be acceptable.

With regard to the hierarchy as presented, Harrietsham should be removed as a 'rural service centre' and included as a 'larger village', whilst Yalding should be removed from the 'larger village' tier and should be included in the 'village' tier that we suggest above. We do not consider that Harrietsham has a sufficient range of services and facilities to warrant designation as a rural service centre, and we would question the logic of so defining it when it is so close to Lenham – they can't both function as rural service centres. Yalding simply does not have the range of services to justify its inclusion as a larger village.

Paragraph 4.16 Maidstone Borough Settlement Hierarchy (Page 19)

CPRE Kent is concerned that the settlement hierarchy is incomplete and that it should be extended to include the villages that fall below the larger villages. This would include those settlements for which village boundaries have been defined and to which spatial objective 5 relates. It is likely that such

villages will also provide opportunities for infill development, and thus contribute towards the windfall allowance that we suggest.

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Policy SS1 (page 21)

CPRE Kent objects to Policy SS1 for the following reasons:

- **Bullet 1i:** That a housing target of 18,560 is too high for the reasons we explain elsewhere in our response to the Plan. [See comment on submitted CPRE KENT representation on the Council's Consultation Portal at Question 3 (3.3)] .
- **Bullet 1ii:** That provision for 187 Gypsy and Traveller pitches and 11 Travelling Showpeople plots is too high. CPRE Kent considers that no sound evidence of need has been provided. This is because the GTTSA issued in March 2012 was carried out under the requirements of the 2004 Housing Act and that since then the definition had been changed for planning purposes by DCLG (in March 2012 and Planning Policy for Traveller Sites, August 2015). We consider that that a new GTTSA may result in a reduction in the number of sites needed.
- **Bullet 1v:** Whilst the Plan acknowledges that the new assessment of employment needs has taken account of the new Kent Institute of Medicine and Surgery and an expanded medical campus at Junction 7 of the M20 (paragraph 4.7), it is unclear to us if the land provision made for this is in addition to that needed to meet the identified employment needs for B1, B2 and B8 uses, or whether it substitute for need that would otherwise need to be provided by further B1, B2 and B8 provisions. Clarification is needed as to the relationship of the proposed floorspace for medical use **vis-à-vis** that proposed for traditional B1, B2 and B8 uses.
- **Bullet 2:** Paragraph 17.59 states 'The development strategy for the borough is based on meeting future housing through best use of previously developed land before releasing greenfield sites for development in order to protect the borough's valuable landscape and biodiversity needs.' We support this development strategy. However, the vast majority (84%) of dwellings are allocated on greenfield sites, indicating that the housing allocations are not in line with the stated development strategy.
- **Bullet 3:** We are concerned that some of the housing allocations are on best and most versatile agricultural land, lie within or affect the setting of designated landscape areas, and have an adverse impact on traffic. The 2006 Kent Structure Plan identified a 'strategic gap' to 'separate the Medway Gap urban area (at Aylesford and Ditton) from the north western edge of Maidstone' to prevent the coalescence of these urban areas. The north-west strategic development location is located within this Strategic Gap bringing the Maidstone urban area up to the Borough boundary. This both reduces the extent of the Strategic Gap and brings the risk of encouraging development on the Tonbridge and Malling side and thus leading to the coalescence of these separate urban areas.
- **Bullet 4:** CPRE Kent objects strongly to the inclusion of Woodcut Farm in EMP1(5).
- **Bullet 5:** That Harrietsham be deleted as a rural service centre.

- **Bullet 6:** That Yalding be deleted as a larger village, as we explain in our response to para 4.16 and that reference be included to the role of Neighbourhood Plans in delivering proposed development at the larger villages.
- **Bullet 7:** CPRE Kent objects most strongly to the identification of Lenham as a future location for growth for 1,500 dwellings, and this suggestion should be deleted from the Plan – see our representation on Policy H2(3).
- The Policy should also contain an additional point on the countryside, reflecting para 4.18 of the supporting text. We would suggest:
“The intrinsic character and beauty of the countryside, including its tranquillity, will be protected.”

Policy SP 1 Maidstone Urban Area (page 25)

CPRE Kent has the following concerns:

1. **Bullet 3:** We are concerned that all the dwellings allocated are on greenfield sites. The 2006 Kent Structure Plan identified a ‘strategic gap’ to ‘separate the Medway Gap urban area (at Aylesford and Ditton) from the north western edge of Maidstone’ to prevent the coalescence of these urban areas. The north-west strategic development location is located within this Strategic Gap bringing the Maidstone urban area up to the Borough boundary. This both reduces the extent of the Strategic Gap and brings the risk of encouraging development on the Tonbridge and Malling side and thus leading to the coalescence of these separate urban areas.
 - **Bullet 3iii:** The allocation of land at Woodcut Farm for employment uses (Policy EMP1 (5))

Policy SP2 Maidstone urban area: north west strategic development location (page 27)

CPRE Kent objects to the strategic development location for the following reasons:

- The cumulative impact of development, The 2006 Kent Structure Plan identified a ‘strategic gap’ to ‘separate the Medway Gap urban area (at Aylesford and Ditton) from the north western edge of Maidstone’ to prevent the coalescence of these urban areas. The north-west strategic development location is located within this Strategic Gap bringing the Maidstone urban area up to the Borough boundary. This both reduces the extent of the Strategic Gap and brings the risk of encouraging development on the Tonbridge and Malling side and thus leading to the coalescence of these separate urban areas.
- Inadequate traffic capacity at the junctions of Fountain Lane (B2246) and Tonbridge Road (A26) and Hermitage Lane (B2246) and St Andrews Road/ Heath Road (Barming). These junctions are already exceeding capacity at peak times. The development requires a junction improvement on Hermitage Lane and London Road within an adjoining Borough and outside the Council’s jurisdiction. Hermitage Lane provides access to Maidstone Hospital and via A26 to Pembury Hospital where A&E services are based.
- The impact of the increased traffic at these locations will severely impact the air quality in a highly sensitive area around the Maidstone Hospital contrary to Policy DM16 (Air Quality) and para 11.88.
- The combination of sites H1(3) and H1(4) would create an unacceptable alteration to the character and environment of Rede Wood Road/Broomshaw Road.

Policy SP3 Maidstone urban area: south east strategic development location (page 29)

CPRE supports the inclusion of sites H1 (5) and (6) – see our representations.

CPRE Kent objects to the inclusion of sites H1(7)-(10) on the following grounds:

- The sites are identified as Grade 2 agricultural land classification on the London and South East Region Agricultural Land Classification Map and the NPPF dissuades the use of higher quality agricultural land.

- The sites form part of a green gap between the eastern side of the Maidstone conurbation and Langley Heath.
- The cumulative impact of the sites and their impact on traffic on the Sutton Road.

Policy SP4 Maidstone Town Centre (page 40)

- Bullet 1ii: CPRE Kent supports in principle the redevelopment of this area but would wish to see it as a residential led development rather than retail, as this is a sustainable town centre site close to the railway station. We have some reservations, though, about the loss of the railway car park [see our response to Policy RMX (2)].
Amend “*retail-led*” to “*mixed-use*”
- Greater emphasis should be given to the provision of residential development within the town centre
- Point 2i: Include a reference to the need to restrict building heights in the town centre in order to respect townscape and the historic fabric.
- Point `ix: CPRE Kent has concerns that the draft ITS has not been agreed by KCC and the Joint Transportation Board.

Policy SP5 Rural service centres (page 42)

Whilst CPRE Kent supports the policy it does not support the identification of Harrietsham as a rural service centre, as set out in our representation to para 4.12 (Settlement hierarchy). The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP6: Harrietsham Rural Service Centre (page 43)

CPRE Kent does not support the identification of Harrietsham as a rural support centre, as explained in our representation to para 4.16 (Settlement hierarchy). We also objected to the inclusion of sites H1(33)-(350) which it is understood have now been granted planning permission.

The policy should be deleted

Policy SP7 Headcorn Rural Service Centre (page 46)

CPRE Kent objects to the allocation of sites H1(37)-(39), (41) in bullet 1 - see our specific representations. The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP8: Lenham Rural Service Centre (page 48)

CPRE Kent objects most strongly to the identification of Lenham as a future location for growth for 1,500 dwellings, and this suggestion should be deleted from the Plan – see our representation on Policy H2(3).

CPRE Kent objects to the allocation of sites H1(427)-(43) in bullet 1 - see our specific representations.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP9: Marden Rural Service Centre (page 51)

CPRE Kent objects to the allocation of sites H1(44)-(45), (471)-(482) in bullet 1 - see our specific representations.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP10: Staplehurst Rural Service Centre (page 53)

CPRE Kent objects to the allocation of sites H1(49)-(51) in bullet 1 - see our specific representations.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP11: Larger villages (page 55)

CPRE does not support the identification of Yalding as a larger village, as explained in our representation to para 4.12 (Settlement hierarchy).

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP12 Boughton Monchelsea Larger Village (page 56)

CPRE Kent objects to the allocation of sites H1(52)-(57) in bullet 1 - see our specific representations.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP13 Coxheath Larger Village (page 58)

CPRE Kent objects to the allocation of sites H1(58)-(62) in bullet 1 - see our specific representations.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP14 Eyhorne Street Larger Village (page 60)

CPRE Kent objects to the allocation of sites H1(64)-(65) in bullet 1 - see our specific representations and does not consider that Eyhorne Street should be identified as a larger village. The parish of Hollingbourne, within which Eyhorne Street lies along with Hollingbourne to the north and Broad Street to the west, at 2011 had a population of 949 living in 410 dwellings. Eyhorne Street has few facilities: a couple of pubs, a small village shop, hairdresser, ophthalmic clinic and village hall.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP15 Sutton Valence Larger Village (page 62)

CPRE Kent objects to the allocation of site H1(66) in bullet 1 - see our specific representation.

The text should also provide commentary on the role that Neighbourhood Plans will play.

Policy SP16 Yalding Larger Village (page 64)

CPRE does not support the identification of Yalding as a larger village, as explained in our representation to para 4.16 (Settlement hierarchy).

We also object to the allocation of sites H1(67) and RMX1(4) in bullet 1 - see our specific representations.

The text should also provide commentary on the role that Neighbourhood Plans will play.

SP17: Countryside (page 70)

CPRE Kent supports this Policy, but considers that it should be more positively worded to ensure that the countryside is protected from development. To this end the following changes should be made:

1. Amend the opening paragraph to read as follows:
"The countryside is defined as all those parts of the plan area outside the settlement boundaries defined on the policies map, and its intrinsic quality and character will be protected and enhanced."
2. Point 1: Amend the opening paragraph to read as follows:
"Provided proposals do not harm the intrinsic quality and character of the countryside, the following types of development will be permitted:"
3. Point 1ii: Amend point a. to read as follows:
"Meet a proven essential need for a rural worker to live at or near their place of work in accordance with Policy DM35."
Point 4: Amend to read as follows:
"The best and most versatile agricultural land will be protected from irreversible development. Proposals will be supported which facilitate more efficient and effective use of agricultural land for agricultural purposes provided any adverse impacts on the appearance and character of the landscape can be appropriately mitigated;"
Point 5: Delete the words 'where appropriate'.

Policy H1(1) Bridge Nursery, London Road, Maidstone (Page 79)

CPRE Kent does not object to this site, but would comment that Policy ID1 (para. 14.7) states that infrastructure priority is of transport for both Residential and Business and Retail Development and detailed junction improvements would be required to allow exiting traffic to turn westwards on exit from the development onto the A20.

Policy H1(2) East of Hermitage Lane, Maidstone (page 80)

CPRE Kent objects to this development on the grounds of:

- inadequate traffic capacity at the junctions of Fountain Lane (B2246) and Tonbridge Road (A26) and Hermitage Lane (B2246) and St Andrews Road/ Heath Road (Barming). These junctions are already exceeding capacity at peak times.
- the impact of the increased traffic at these locations will severely impact the air quality in a highly sensitive area around the Maidstone Hospital contrary to Policy DM5 (Air Quality) and para 17.37.
- this site involves the loss of agricultural land

Policy H1(3) West of Hermitage Lane, Maidstone (page 82)

CPRE Kent objects to this development on the grounds of:

- inadequate traffic capacity at the junctions of Fountain Lane (B2246) and Tonbridge Road (A26) and Hermitage Lane (B2246) and St Andrews Road/ Heath Road (Barming). These junctions are already exceeding capacity at peak times.
- the impact of the increased traffic at these locations will severely impact the air quality in a highly sensitive area around the Maidstone Hospital contrary to the Policy DM5 (Air Quality) and para 17.37.

Policy H1(4) Oakapple Lane, Barming (page 84)

CPRE Kent objects to this development on the grounds of:

- inadequate traffic capacity at the junctions of Fountain Lane (B2246) and Tonbridge Road (A26) and Hermitage Lane (B2246) and St Andrews Road/ Heath Road (Barming). These junctions are already exceeding capacity at peak times.

- the combination of sites (3) and (4) would create an unacceptable alteration to the character and environment of Rede Wood Road/Broomshaw Road contrary to para 17.59 which states that “*In all cases development will only be acceptable where schemes are well designed and do not compromise the overall character of the area*”.

Policy H1(5) Langley Park, Sutton Road, Boughton Monchelsea (page 85)

CPRE Kent notes that the site benefits from planning permission.

Policy H1(6) North of Sutton Road, Otham (page 87)

CPRE Kent notes that the site benefits from planning permission.

Policy H1(7) North of Bicknor Wood, Gore Court Road, Otham (page 89)

CPRE Kent objects to this site.

It is on the northern side of Bicknor Wood, and so close to site H1(6). The present usage is arable farmland, is green countryside contributing to the food supply and should be protected from built development.

Particularly alarming is the proposal for access from Gore Court Road connecting to a spine road on site H1 (6) emphasizing the connection between these two sites.

The cumulative impact of the site in conjunction with the other housing allocations in this area

Policy H1 (8) West of Church Road, Otham (page 90)

CPRE Kent objects to this site.

This is agricultural land. The effect of development would be to link Downswood with the more urban settlements off Willington Street, mainly along Chapman Avenue, as far south as Senacre Wood. Although the proposal is to retain a strip of undeveloped land between this development and Chapman Avenue and around the St. Nicholas Church, in reality the housing would totally dominate the created suburban area, again contrary to the stated wish of Policy SS1 (9).

Access/egress from the proposed estate would be a severe problem. At present access/egress for the residents of Downswood is very difficult even during mid-day. At Willington Street there are often long queues, Spot Lane is narrow in places and liable to flooding at times and Church Road is winding and narrow. The additional traffic just could not be accommodated with any safety or sustainability as the fuel used in any queues and the resultant exhaust fumes would be excessive.

There would not be sufficient school places.

The cumulative impact of the site in conjunction with the other housing allocations in this area

The effect on the setting of The Rectory, Church House, the Monument to Thomas Carter, Church of St Nicholas, and Monumet north of Church of St Nicholas listed buildings.

Policy H1(9) Bicknor Farm, Sutton Road, Otham (page 92)

CPRE Kent objects to this site as it is considered premature.

The site is countryside currently used for agriculture. It abuts on its western side both H1(6) and Bicknor Wood, thereby putting more pressure on Bicknor Wood as an open space amongst the large housing development proposals.

The cumulative impact of the site in conjunction with the other housing allocations in this area

The effect on the setting of Bishops, Rumwood, Tile Barn and Langley Park listed buildings.

Policy H1(10) South of Sutton Road, Langley (page 93)

CPRE Kent objects to this site on the following grounds:

1. The site is identified as Grade 2 agricultural land classification on the London and South East Region Agricultural Land Classification Map and the NPPF dissuades the use of higher quality agricultural land.
2. Part of the site is used as a golf driving range and plant nursery both with limited associated development the land could be returned to agricultural use and does not therefore need to be allocated for housing.
3. It forms part of a green gap between the eastern side of the Maidstone conurbation and Langley Heath.
4. It is unsustainable in terms of additional traffic on the Sutton Road, regardless of the proposals for highway improvements on the A274
5. The cumulative impact of the site in conjunction with the other housing allocations in this area
6. The effect on the setting of listed building at Fir Tree Farm and Newhouse Farm.

Policy H1 (11) Springfield, Royal Engineers Road and Mill Lane, Maidstone

CPRE Kent supports this allocation

Policy H1 (12) 180-188 Union Street, Maidstone

No objection

Policy H1 (13) Medway Street, Maidstone

CPRE Kent supports this allocation.

Policy H1 (14) American Golf, Tonbridge Road, Maidstone

CPRE Kent supports this allocation.

Policy H1 (15) 6 Tonbridge Road, Maidstone

CPRE Kent supports this allocation.

Policy H1 (16) Slencrest House, 3 Tonbridge Road, Maidstone

No objection

Policy H1 (17) Laguna, Hart Street, Maidstone

CPRE Kent supports this allocation.

Policy H1 (18) Dunning Hall (off Fremlin Walk), Week Street, Maidstone

No objection

Policy H1 (19) 18-21 Foster Street, Maidstone

No objection

Policy H1 (20) Wren's Cross, Upper Stone Street, Maidstone

No objection subject to the protection of the listed buildings and heritage assets and their setting, and access is onto Lower Stone Street.

Policy H1(21) Barty Farm, Roundwell, Thurnham

CPRE Kent objects to this site.

This is a greenfield site, in the countryside, currently used for agriculture. Although from the map it might appear to be a small extension of already developed housing, the housing to the west of Water Lane is the Mallings Drive development, well above the sunken lane, with no connection with the eastern area of land. The dwellings along Roundwell are relatively few with quite large gardens, and would be definitely unrelated to any estate type development on this site. So any proposed development would be inappropriate to the character of the area, contrary to Policy DM1 on good design.

Furthermore:

1. the access/egress would be poor, along a long, narrow lane;
2. there would be no school places within several miles for any children who came to live on the estate
3. the development would not even meet the requirements of the Parish of Thurnham, and perhaps of Bearsted for affordable local housing, since any affordable housing in this commercial development would not be reserved for people with local connections;

Policy H1 (22) Whitmore Street, Maidstone

CPRE Kent supports this allocation.

Policy H1 (23) North Street, Barming

No objection

Policy H1 (24) Postley Road, Tovil

CPRE Kent objects to this site on the grounds of:

1. density - at 35 units per hectare this does not take into consideration its proximity to the Loose Valley Conservation Area and the listed building Hayle Manor. Paragraph 17.59 states that *"In all cases development will only be acceptable where schemes are well designed and do not compromise the overall character of the area"*.
2. the ecological survey for this site was carried out prior to the relocation of 1300 slow worms and 450 common lizards on the adjacent nature reserve, some of which may have migrated onto this land.

Policy H1 (25) Bridge Industrial Centre, Wharf Road, Tovil

No objection

Policy H1(26) Tovil Working Men's Club, Tovil Hill, Maidstone

No objection

Policy H1 (27) Kent Policy HQ, Sutton Road, Maidstone

CPRE Kent supports this allocation.

Policy H1 (28) Kent Police training school, Sutton Road, Maidstone

CPRE Kent supports this allocation.

Policy H1 (29) New Line Learning, Boughton Lane, Loose

CPRE Kent objects to the allocation of this site as it will close an important open gap in the urban area and welcomes the recent Inspector's decision to refuse development at this site.

Policy H1 (30) West of Eclipse, Old Sittingbourne Road, Maidstone

CPRE Kent objects to this site as it is in the open countryside, albeit only a small development of 35 dwellings on 1 hectare of the 1.9 hectare site, with the remainder of land left undeveloped as it abuts the M20.

This is an extension of built development into the open countryside, currently used for grazing livestock. Development here might set a precedent as there is additional open countryside land to the west that might be sought for housing, thus extending the Penenden Heath further towards the M20 and reducing the views towards the Kent Downs AONB.

Policy H1 (31) Bearsted Station Goods Yard, Bearsted

Object on the grounds that the existing station car park is inadequate and the site should be used to provide additional station parking.

Policy H1 (32) Cross Keys, Bearsted

CPRE Kent objects on the following grounds:

1. a greenfield site, that is used for rough grazing.
2. Central part of site in Flood zone 2 and 3
3. next to an AQMA – would development make the situation worse?
4. Within a Special Landscape Area
5. Adjacent to an Area of Local Landscape Importance
6. Impact on setting of AONB
7. Potential for protected/notable species to be present
8. Is adjacent to a conservation area
9. Impact on listed buildings
10. Land contains the site of Mott Hall, a medieval/post medieval manor complex with associated historic landscape including pond bay and earthworks.

Policy H1 (33) South of Ashford Road, Harrietsham

CPRE Kent objected to this site and notes that the site benefits from planning permission.

Policy H1 (34) Mayfield Nursery, Ashford Road, Harrietsham

CPRE Kent objects to the use of this site for residential development on the grounds that :

1. the site lies well outside of the core village with its facilities.
2. safe pedestrian or cycle access to the village would be extremely difficult.
3. the site would create yet another access point onto the A20
4. the land is very wet, as surface water from the higher-lying areas drains underground into this low-lying land. We are concerned that preventing this natural drainage will create flooding elsewhere.

Policy H1 (35) Church Road, Harrietsham

CPRE Kent objects to this site for the following reasons:

1. The A20 is a village by-pass which was built to allow traffic to flow freely, thereby reducing fuel consumption, air pollution and noise levels. Creating a by-pass is a measure which serves the improvement of the quality of life of the villagers and traffic users.
2. It does not make any sense to extend the village on both sides of the A20 as it renders the A20 redundant as a bypass and will inevitably create stop/go traffic problems. This will bring:
 - i. more noise
 - ii. more pollution, with the associated health risks for the people of Harrietsham
 - iii. more fuel consumption
 - iv. consequent impact on the fragile local environment.
3. Traffic calming measures will create a bottleneck for the flow of traffic on the A20, which will be especially problematic at peak times and at times when the M20 is closed (e.g. Operation Stack).

Policy H1 (36) Old School Nursery, Station Road, Headcorn

CPRE Kent supports the allocation of this site, which is within the already built area of the village.

Policy H1 (37) Ulcombe Road and Mill Bank, Headcorn

CPRE Kent objects to this allocation as:

1. It comprises a major extension to the northern side of the village into an area designated as a Special Landscape Area;
2. It is classified as agricultural land;
3. It is on the edge of a flood prone area; and
4. There is insufficient infrastructure in place including sewers and road infrastructure.

Policy H1 (38) Grigg Lane and Lenham Road, Headcorn

CPRE Kent objects to this allocation as:

1. It will extend the village into green agricultural countryside;
2. It is covered by special landscape area classification;
3. It is outside the village envelope;
4. There is insufficient infrastructure in place i.e. sewers and roads; and
5. It is on the edge of flood prone area.

Policy H1 (39) South of Grigg Lane, Headcorn

CPRE Kent objects to this allocation as:

1. The whole of site is covered by a special landscape classification, with green countryside to south east;
2. There is insufficient infrastructure in place; and
3. It is on the edge of a flood prone area with the river Sherway to the east.

Policy H1 (40) Knaves Acre, Headcorn

CPRE Kent supports this allocation.

Policy H1 (41) North of Lenham Road, Headcorn

This looks to be a new allocation that has not been consulted upon.

The Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA) 2016 Accepts the site as a potential housing site.

However, there are possible grounds for objecting, should you wish to:

It is:

1. A greenfield site (with a couple of buildings in one corner) used for horse grazing.
2. Within Low Weald Special Landscape Area MBWLP 2000 Policy ENV34.
3. Site is within an area with known.

Policy H1 (42) Tanyard Farm, Old Ashford Road, Lenham

CPRE Kent objects strongly to the allocation of this site:

- It is in a prominent location in the open foreground of the AONB (Policy SP17 5).
- It lies in East Lenham Vale which the Landscape Capacity Study states that the Landscape Character Sensitivity and Visual Sensitivity are both 'High'. It recommends that Lenham is not extended along the A20, nor to build in the foreground of the AONB
- The site allows views to the Memorial Cross.
- It is grade 2 agricultural land.
- The North Downs Aquifer extends into the site.
- It would set a precedent for Policy H2 (3) development areas which would completely destroy the landscape – protected views both to and from the AONB.
- it comprises an unacceptable expansion of Lenham and comprises 'urban sprawl'.

Policy H1 (43) Glebe Gardens, Lenham

CPRE Kent objects to this site for the following reasons:

- The land is subject to groundwater flooding
- It provides a wildlife corridor between Glebe pond and land to the south
- Is a wetland habitat
- The cumulative effect of adjacent developments on wildlife
- The Upper Stour in this location is identified by the Environment Agency as being in a bad ecological state.

We would like the Glebe pond and amenity area to the north safeguarded as POS.

Policy H1 (44) Howland Road, Marden

CPRE Kent objected to this site and notes that the site now benefits from outline planning permission.

Policy H1 (45) Stanley Farm, Plain Road, Marden

CPRE Kent objected to this site and notes that the site benefits from planning permission.

Policy H1 (46) The Parsonage, Goudhurst Road, Marden

We note that this site already has planning permission, although we consider totally improper extension in to agricultural backland.

Policy H1 (47) Marden Cricket and Hockey Club, Stanley Road, Marden

CPRE Kent objected to this site and notes that the site now benefits from planning permission.

Policy H1 (48) South of the Parsonage, Goudhurst Road, Marden

Object on the following grounds:

- 1 It is an inappropriate location.
- 2 It is a greenfield site.
- 3 The site is identified as Grade 2 agricultural land classification on the London and South East Region Agricultural Land Classification Map.
- 4 The site lies within the Staplehurst Low Weald Landscape Character Area for which the Condition Assessment is Good and the Sensitivity Assessment is High and where the Character Area Assessment Actions are for conservation and enhancement. It would have a harmful effect on landscape character.
- 5 It is backland development.
- 6 The impact on the setting of buildings to the south of the site.
- 7 Marden village is now entirely surrounded by new developments of large estates, including the MAP site, Parsonage Farm, Stanley Farm, north of Howland Road, and the Hockey Ground. The cumulative impact on residents and infrastructure should be considered.
- 8 Result in increased traffic on A229.

Policy H1 (49) Hen and Duckhurst Farm, Marden Road, Staplehurst

CPRE Kent objects strongly to this site. It is far too large and will overwhelm the existing character of the village. It extends too far to the north and east.

We believe that Staplehurst will be overwhelmed by the sheer numbers of houses being proposed at this site and site (507) contrary to:

- 1 Key local issues: item 2;
 - 2 Spatial objectives – item 4;
 - 3 Policy SS1 - item 5; and
 - 4 Paragraph 17.59/Policy DM12 of the Plan.
- Result in increased traffic on A229.

Policy H1 (50) Fishers Farm, Fishers Road, Staplehurst

CPRE Kent objects strongly to this site. It is far too much development, all behind existing properties, and will overwhelm the existing character of the village.

We believe that Staplehurst will be overwhelmed by the sheer numbers of houses being proposed at this site and site (49) contrary to:

- 1 Key local issues: item 2;
 - 2 Spatial objectives – item 4;
 - 3 Policy SS1 - item 5; and
 - 4 Paragraph 17.59/Policy DM12 of the Plan.
- Result in increased traffic on A229.

Policy H1 (51) North of Henhurst Farm, Staplehurst

Object on the following grounds:

- 1 It is a greenfield site.
- 2 It is predominantly in agricultural use.
- 3 The site is identified as Grade 3 agricultural land classification on the London and South East Region Agricultural Land Classification Map.
- 4 The site lies within the Staplehurst Low Weald Landscape Character Area for which the Condition Assessment is 'Good' and the Sensitivity Assessment is High and where the Character Area Assessment Actions are for conservation and enhancement. It would have a harmful effect on landscape character.
- 5 It is backland development.
- 6 No access is shown for the site.
- 7 Concerned about the potential impact that the residential development and open space provision could have on village roads.
- 8 Concern that given the location and size of the proposed open space to the south of the area to be developed this development will set a precedent for further future development on greenfield land to the north and west of the land identified for housing.
- 9 Result in increased traffic on A229.

Policy H1 (52) Hubbards Lane and Haste Hill Road, Boughton Monchelsea

CPRE Kent supports this proposal as the land has no current use and it joins up two already developed roads at the junction Hubbards lane and Haste Hill road.

Policy H1 (53) Boughton Lane, Boughton Monchelsea and Loose

Object on the following grounds:

- 1 This is a greenfield site.
- 2 The site is identified as Grade 2 agricultural land classification on the London and South East Region Agricultural Land Classification Map.
- 3 The impact on the rural / countryside character of the area, and even more so particularly when combined with site H1(63). This point was acknowledged by the 2000 Local Plan Inspector, which remains a valid concern.
- 4 The site lies within an area defined as the Loose Landscape of Local Value on page 10 of the October 2015 consultation which draft policy SP5 The Countryside (6) states will be protected.
- 5 The site lies within the Southern Anti-Coalescence Belt as shown on the Adopted Local Plan 2000 and saved Policy ENV 32 states that within the defined Belt development which significantly extends the defined urban area will not be permitted.
- 6 Consideration must be given to the cumulative impact of proposed allocations H1(63), (70), (71), (76) in this consultation and H1(23) in the 2014 consultation.
- 7 The effect on the setting of listed folley and Ha Ha in the grounds of Boughton Mount.

Policy H1 (54) Boughton Mount, Boughton Lane, Boughton Monchelsea

Object on the following grounds:

- 1 The southern part of the site is greenfield site.
- 2 The southern part of the site is identified as Grade 2 agricultural land classification in the London and South East Region Agricultural Land Classification Map.
- 3 Impact on the rural / countryside character of the area and even more so particularly when combined with site H1(62). This point was acknowledged by the 2000 Local Plan Inspector, which remains a valid concern.
- 4 The site lies within an area defined as the Loose Landscape of Local Value on page 10 of the October 2015 consultation which draft policy SP5 The Countryside (6) states will be protected.
- 5 The site lies within the Southern Anti-Coalescence Belt as shown on the Adopted Local Plan 2000 and saved Policy ENV 32 states that within the defined Belt development which significantly extends the defined urban area will not be permitted.

- 6 Consideration must be given to the cumulative impact of proposed allocations H1(53), (54), (55), (56) and H1(57), including traffic on the already busy A229 and B2163.
- 7 The effect on the setting of listed folley and Ha Ha in the grounds of Boughton Mount.

Policy H1 (55) Junction of Church Street and Heath Road, Boughton Monchelsea

Object on the following grounds:

- 1 Loss of Woodland.
- 2 The site lies within Landscape Character Area No. 29 Boughton Monchelsea to Chart Sutton Plateau where one of the summary of actions is “improve the sense of place between swathes of development”. Development of this site would not meet this objective.
- 3 Concerned about the potential impact that the residential development on Church Street and Heath Road, including their junction.
- 4 Consider about safety issues for pedestrians given the proximity of Boughton Monchelsea Primary School opposite.
- 5 Boughton Monchelsea Primary School is oversubscribed.
- 6 Consideration must be given to the cumulative impact of proposed H1(53), (54), (55), (56) and H1(57), including traffic on the already busy A229 and B2163.

Policy H1 (56) Lyewood Farm, Green Lane, Boughton Monchelsea

Object on the following grounds:

1. The site is in an unsustainable location.
2. Concern about increased traffic on Green Lane.
3. Consideration must be given to the cumulative impact of proposed allocations H1(53), (54), (55), (56) and H1(57), including traffic on the already busy A229 and B2163.
4. The effect on the setting of listed buildings to the south, west and north of the site.

Policy H1 (57) Hubbards Lane, Loose

Object on the following grounds:

1. It is an inappropriate location.
2. It is a greenfield site.
3. It is in agricultural use.
4. The site is identified as Grade 2 agricultural land classification on the London and South East Region Agricultural Land Classification Map
5. Is ribbon development.
6. Concern that allowing development in this location will set a precedent for continued ribbon development southward along Hubbards Lane as well as eastwards along Heath Lane from its junction with Hubbards Lane.
- 7 Consideration must be given to the cumulative impact of proposed allocations H1(53), (54), (55), (56) and H1(57), including traffic on the already busy A220 and B2163.

Policy H1 (58) Linden Farm, Stockett Lane, Coxheath

CPRE Kent objects to this allocation as:

1. access to the site will be along Stockett Lane from the centre of Coxheath at the junction with the B2162 Heath road which has a poor crash record; and
2. it will lead to increased congestion in the centre of the village.
3. On busy B2163

Policy H1 (59) Heathfield, Heath Road, Coxheath

CPRE Kent objected to this allocation which has now been permitted.

Policy H1 (60) Forstal Lane, Coxheath

CPRE Kent objected very strongly to this allocation as:

1. it unacceptably extends the north east side of Coxheath;

2. it is connected to the Heathfield, Heath Road development on prime agricultural land, which is now being developed;
3. it will narrow the strip of green, open countryside between Coxheath and Loose A229;
4. It is not in the Coxheath Neighbourhood Plan; and
5. the proposed access to the development will be along Forstal Lane only which floods into Stockett Lane Coxheath the south end of which connects with Heath Road B2163 in the centre of Coxheath which is a car crash black spot.

Policy H1 (61) North of Heath Road (Older's Field), Coxheath

No objection subject to the deletion of H1(45) Forstal Lane, especially as planning permission has been granted for site H1(44) Heathfield.

Policy H1 (62) Clockhouse Farm, Heath Road, Coxheath

This looks to be a new allocation that has not been consulted upon.

The Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA) 2016 Accepts the site as a potential housing site.

However, there are possible grounds for objecting, should you wish to:
It is:

1. A greenfield site in agricultural use
2. Agricultural land classification 2 / 3
3. The site lies in the open countryside and is a designated Special Landscape Area.
4. The site lies close to the Grade II listed Clock House Farmhouse which just about clings to its original rural setting. Development of this site would bring buildings closer to the access track serving Clock House Farmhouse and would have some impact on its setting by further urbanisation of the surroundings.

Policy H1 (63) East of Eyhorne Street, Eyhorne Street (Hollingbourne)

CPRE Kent accepts this allocation provided the trees on the site are retained.

Policy H1 (64) West of Eyhorne Street, Eyhorne Street (Hollingbourne)

CPRE Kent objects to this allocation but consider that some development confined to the road frontage might be acceptable if supported by the local community.

Policy H1 (65) Adjacent to The Windmill PH, Eyhorne Street, Hollingbourne

Object on the following grounds:

1. It is a greenfield site.
2. It is agricultural land. HO3-189 Site assessment indicates that the site is part Grade 2 and Part Grade 3 Agricultural Land Classification.
3. Incongruous backland development.
4. It will set an unacceptable precedent for land between the site and rear of properties on Eyhorne Street.
5. It does not have good access, including for pedestrians.

Policy H1 (66) Brandy's Bay, South Lane, Sutton Valance

Object on the following grounds:

1. Majority of the site is greenfield.
2. Is backland development.
3. Would result in over development of the area:
4. There is pressure on local doctor's surgery and local schools.
5. Access onto A274 is under stress.
6. Is outside the village envelope.
7. The site provides the rural setting for the settlement.

8. Is in the Special Landscape Area as defined on the Adopted Local Plan where policy ENV34 provides protection and conservation of the scenic quality and distinctive character of the area and gives priority to the landscape over other planning considerations.
9. Is in the lea of the Greensand Ridge. It is understood that a stream runs through the site and have concerns about flooding, both on site and elsewhere if the site is developed.

Policy H1 (67) Vicarage Road, Yalding

CPRE Kent object to this allocation as:

1. access is proposed from Vicarage Road, which is unsuitable;
2. the site comprises agricultural land in open countryside on the edge of Yalding conservation area;
3. it is in a flood prone area;
4. further thought needs to be given to community infrastructure of the village for the future low cost and social housing;
5. flood defence infrastructure for the village is yet to evolve; and.
6. There is no spare infrastructure capacity i.e. roads, sewers, water, electricity and gas.

Policy H1 (68) Bentletts Yard, Claygate Road, Laddingford

No objection so long as the site is allocated for no more than 10 residential units.

H2(1) Maidstone town centre (page 167)

CPRE Kent supports the identification of the town centre as a broad location for housing growth and would wish to see greater provision within the town centre. The contribution from this location seems to come entirely from poorer quality offices, and given the statements made in paragraph 9.2 it is clear that from the work that the Council has undertaken it is known where these poor quality offices are. This being the case we can see no reason why the Plan cannot make specific allocations for these offices to be converted or redeveloped for housing purposes. This will provide more clarity on their future use and the specific contribution that they will make to meeting future housing needs.

H2(2) Invicta Park Barracks (page 167)

CPRE Kent acknowledges that there are uncertainties surrounding the future availability of this site. It is clearly the Council's view that there is the prospect that it could make a contribution towards the end of the Plan period. This being the case, and to provide a firm basis for the future planning of the site to ensure that any such contribution is forthcoming, we consider that it should be formally allocated in the Plan.

Paragraph 9.6 and Policy H2 Broad locations for housing growth (page 164)

CPRE Kent objects to the identification of future locations for housing growth, as this does not provide the necessary certainty needed to ensure that housing need during the Plan period is met. We also object to the inclusion of Lenham as a broad location for housing growth. See our representation on policy H2(3).

H2(3) Lenham (page 168)

CPRE Kent objects most strongly to the identification of Lenham as a future location for growth for 1,500 dwellings, and this suggestion should be deleted from the Plan.

The Plan already proposes sites for allocation at Lenham for a total of 165 dwellings, but the prospect of a further 1,500 is unjustified and would be contrary to the stated purpose of development at the rural service centres – i.e. to maintain and enhance the service centre role of the village and meet the needs of the local community. No evidence has been presented to demonstrate why this scale of development is needed to fulfil these stated intentions.

Such a significant scale of development would be disproportionate to Lenham's position in the settlement hierarchy, compared with the level of development proposed at the other rural service centres, and it would see major expansion of the village. Such major expansion would be at odds with the spatial strategy of the Plan and would be transformational in nature rather than maintaining and enhancing the existing role and character of the village. Strategically, it would set Lenham apart from the other rural service centres, for which no justification is provided. The scale of development would adversely affect the identity and character of the village contrary to the approach put forward in para 4.22 of the plan.

As acknowledged in paragraph 9.6 of the Plan, such major development will present some major challenges in terms of new physical and social infrastructure provision, to which no thought has been given. This makes the prospect of major growth here, in order to meet the proposed housing target, uncertain and unreliable.

We are extremely concerned that whilst it is stated that the opportunities for development are at the eastern and western edges of the village and that they would be considered in detail when the Plan is reviewed, Appendix F defines the future growth location covering the whole village in a very general fashion. Furthermore, having so defined the 'growth location' it allows sites from anywhere in the location to be considered before the Plan is reviewed. This is a confused and inappropriate way to consider future growth and will potentially result in ad hoc and unplanned development coming forward contrary to the plan-led approach advocated in the NPPF. If there are genuine opportunities to expand the village they should be clearly presented so that people can clearly see what is being proposed. If that cannot be done now then the Plan should not seek to provide a mechanism for development to come forward through the 'back door'. This is an entirely unacceptable approach and should be deleted from the Plan.

Additionally we would comment that:

- Unlike the other 'growth locations', the opportunities identified in Lenham involve extensive greenfield land. In accordance with NPPF, there should be a pre-disposition in favour of brownfield sites. In the projected time frame (2026 onwards) other land, and potentially brownfield sites, is likely to become available e.g. redundant office space or empty retail space in town centre locations, due to the growth of internet shopping.
- The suggestion to build 1500 new dwellings in Lenham would double its current size, which is contrary to good planning practice, as communities ought to be given time to absorb new development.
- The land is agricultural land and privately owned. To our knowledge the landowner has not come forward and offered his land for development.
- The retention of agricultural land is, in a time of climate change and growing world population, extremely important. In addition, the farmer earns his livelihood from that land. Would the Council, for example, tell any other kind of business (such as Marley nearby) that it is considering compulsorily purchasing their land to put to another use against their wishes and interests?
- Lenham is the village furthest away from Maidstone within the Borough boundary. If the potential newcomers were to relate at all to Maidstone in their activities such as school, work, or shopping, a development such as this would bring at least 1000 more traffic movements onto the A20 daily.
- The location only vaguely suggested for this development is well outside the core village and would undoubtedly bring many more cars into the village. This same vagueness has the potential to create blight for residents.
- The sites identified in the Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA) 2016 all lie between the A20 and the railway line. The sites are visible from the Kent Downs AONB whose southern boundary abuts the A20 at Lenham. Their development would adversely affect the setting of the AONB contrary to draft policy SP17(5). The scale of development would adversely affect the identity and character of the village contrary to the approach put forward in paragraph 4.22.

Policy GT 1: Gypsy and Traveller site allocations

We did not make representation on the proposed Gypsy and Traveller site allocations at the Regulation 18 Consultation 2014 as we considered that there was no sound evidence of need. This was because the GTTSSA issued in March 2012 was carried out under the requirements of the 2004 Housing Act and that since then the definition had been changed for planning purposes by DCLG in March 2012 and that in light of this CPRE Kent did not feel able to comment on specific sites in advance of a new GTTSSA being undertaken. Since submitting our representation in May 2014 DCLG has further refined the definition along with guidance (i.e. Planning Policy for Traveller Sites, August 2015). We consider that that a new GTTSSA may result in a reduction in the number of sites needed. In light of this CPRE Kent's view remains unchanged, namely that we consider that there is no sound evidence of need to justify the allocated sites and do not therefore feel able to comment on specific sites in advance of a new GTTSSA being undertaken.

Policy RMX1 (1) Newnham Park

CPRE Kent objects to this allocation, though it would seem that planning permission is likely to be granted before the Plan is finalised. We are particularly concerned about retail development in this location, which we consider fails the sequential test required by the NPPF and as a consequence will undermine the town centre.

Policy RMX1 (2) Maidstone East RMSO

CPRE Kent supports in principle the redevelopment of this area but would wish to see it as a residential led development rather than retail, as this is a sustainable town centre site close to the railway station. We have some reservations, though, about the loss of the railway car park and the traffic impact.

Policy RMX 1 (3) King Street car park

CPRE Kent accepts this allocation.

Policy RMX 1 (4) Former Syngenta site, Yalding

This site has been allocated for employment development for some time, and CPRE Protect Kent considers that this should remain the focus for redevelopment. We consider that the site is too detached from the village and its facilities for sustainable residential development.

Paragraph 15.12 and Policy EMP1 Employment allocations (page 196)

CPRE Kent strongly objects to the allocation of land at Woodcut Farm (EMP1(5)) – see our representations on this site.

EMP 1 (1) Mote Road, Maidstone

CPRE Kent objects to this allocation as the site should be retained for car parking.

EMP 1 (2) West of Barradale Farm, Maidstone Road, Headcorn

CPRE Kent objects strongly to this allocation as it comprises inappropriate development in the open countryside.

EMP 1 (3) South of Claygate, Patterden Lane, Marden

CPRE Kent accepts the logic of allocating this site given the development to the north.

EMP 1 (4) West of Wheelbarrow Industrial Estate, Patterden Lane, Marden

CPRE Kent objects to the allocation of this site as it will over extend the existing rural area and impact of increased traffic..

Policy EMP1(5) Woodcut Farm (page 200)

CPRE Kent strongly objects to the allocation of this site on the following grounds, which we consider are sound reasons for not allocating this site:

- 1 The site is in an inappropriate location.
- 2 It is a greenfield site within a wider swathe of greenfield land.

- 3 It is a working farm.
- 4 It will result in encroachment into the open countryside.
- 5 Development in this location would have an adverse effect on the setting of the North Downs AONB contrary to paragraphs 3.11 bullet 6 and 5.77-5.81 of this document and Policy SP17(5) which seek to rigorously protect the setting of the AONB. NPPF paragraph 110 states that plans should allocate land with the least environmental or amenity value.
- 6 The site lies between the North Downs AONB to the north and the Len Valley Landscape of Local Value (Caring Fruit Slopes) immediately to the south. Development of the site would affect the setting of both the designated landscape areas.
- 7 The Maidstone Landscape Capacity Study Site Assessments (January 2015) assessment of the Woodcut Farm site identifies the site as having a low capacity to accommodate economic development.
- 8 The impact on the setting of The effect on the setting of Woodcut Farm and Chrismill Manor listed buildings to the west Old English Cottage, Maidstone Road and Leeds Castle .
- 9 The NPPF encourages plans to allocate land which can accommodate the efficient delivery of goods and supplies; give priorities to pedestrian and cycle movements, and have access to high quality public transport facilities; and consider the needs of people with disabilities by all modes of transport (paragraph 35). Given its location beyond the Maidstone conurbation (the site is 1.5km from the nearest edge) it is not well located for pedestrians, cyclists or people with disabilities; it has a limited bus service with an hourly weekday service to Ashford. Given these factors it is more than likely that people working at the site will travel there by car or motorbike. This point is accepted at paragraph 5.12 of the consultation document. NPPF paragraph 37 states that planning policies should aim for a balance of land uses so that people can be encouraged to minimise journey lengths for employment. The allocation of this site is contrary to the NPPF guidance.
- 10 The Sustainability Appraisal Technical Appendix B: Employment Site Options Interim Sustainability Findings September 2015 considers the site (for 49,300 sq.m. employment floorspace) and concludes:
- 11 "The SA has raised the following issues which will need to be considered in allocating the site, or in taking it forward for development in the future:
- 12 •This site is located on a Greenfield site and not previously developed land
- 13 •This site is located within close proximity to a LWS and the Kent Downs AONB and is adjacent to an Ancient Woodland/Ancient Semi-Natural Woodland, an area identified with significant archaeological features/finds and to the setting of a listed building.
- 14 •This site is not easily accessible to a cycle route, train station, bus stop or the Maidstone Urban area."
- 15 The allocation includes provision for office floorspace. NPPF Paragraph 23 requires local planning authorities to follow a sequential approach in the allocation of office sites: first within a town centre, then edge of centre and to only consider sites elsewhere if sufficient sites cannot be identified, and that these sites should be well connected to the town centre. The site is not within the town centre or in an edge of centre location – it is some 1.5km beyond the eastern edge of the residential area of Bearsted and 6km from the town centre. It has poor public transport connection as set out in point 9 above.
- 16 Allocating Woodcut Farm could set a precedent for further development at Junction 8, including land at the refused Waterside Park application site.

Planning history for the development of employment locations at and around M20 Junction 8 shows that this is a controversial area for development, first with the Kent International Gateway application and then more recently with the Waterside Park application.

The site was part of the Kent International Gateway application which was refused at Inquiry, largely on environmental grounds.

The planning appeal for employment uses on land to the south at Waterside Park has been refused. The Inspector raised concerns regarding the visual and landscape impact, including the setting of the AONB; the loss of countryside; harm to the setting of heritage assets; the impact of development reducing gaps between existing scattered developments to give the appearance of a mass of development which would be detrimental to the wider landscape and rural character; that workers

would predominantly access the site by private car / motorcycle; the high sensitivity of walkers using the public rights of way in the AONB. These concerns also apply to the Woodcut Farm Site.

The Inspector at paragraph 94 writes ‘I consider the need for developments on these scales in this location and consequent loss of greenfield land within the countryside had not been fully justified’ and ‘while there does appear to be a need for more employment land allocations, it has not yet been demonstrated that these will necessarily result in the allocation of land in the countryside.’ The Inspector at paragraph 95 continues ‘Even if this proves to be the case I consider that it has also not been shown, for the reasons set out above, that Waterside Park would be an acceptable location for developments of this size.’ Given that the Woodcut Farm allocation (25.8ha) is significantly larger (61%) than the larger Waterside Park application (16.1ha) a similar conclusion can be drawn for the proposed allocation at Woodcut Farm.

The Planning Inspector for the Waterside Park appeal at paragraph 62 highlights the fact that ‘there is available industrial floor space in neighbouring boroughs and this will need to be taken into account under the ‘duty to co-operate’ set by the Framework when determining the precise requirement that Maidstone will need to provide’ (paragraphs 160 and 182). The response to the recent call for housing sites by Tonbridge and Malling Borough Council indicates that there are vacant employment sites within the Medway Gap area of Tonbridge and Malling Borough (T&MBC) which have good transport links with Maidstone. The Council should discuss with T&MBC whether there are opportunities for these sites to make provision towards Maidstone’s employment land requirements.

Policy DM 1 Principles of good design

CPRE Kent supports this policy

Policy DM 2 Sustainable design

CPRE Kent supports this policy

Policy DM 3 Historic and natural environment

CPRE Protect Kent supports this Policy, but:

1. In bullet 1i it is unclear what is meant by “*protect positive historic and landscape...*”. Why is the word ‘positive’ included? Without the clarification anyone can argue that any heritage asset is a negative characteristic leading to the partial or total irrevocable harm of the asset.
2. In bullet 2 add “, *tranquillity*” after “*diversity*”.

Policy DM 4: Development on brownfield land

We previously responded to the policy as follows:

‘CPRE Protect Kent supports the use of brownfield land within existing settlements in preference to greenfield land. Whilst we welcome the support that the Policy gives to re-using brownfield land, we are concerned that it supports the development of brownfield land in any location and the revised wording. We recognise that such sites will always be accessed by car and consideration should be given the capacity of the local road network, including the suitability for the type and scale of development.

Policy DM 5 Air Quality

CPRE Kent supports this policy

Policy DM 6 Non-conforming uses

This seems to be a Policy that simply refers to other policies, though in so doing it is unclear what policies it is referring to. The Policy needs to be redrafted to provide clear guidance on where non-conforming uses would be appropriate.

Policy DM 7: External Lighting

CPRE Kent supports this policy subject to the policy setting out limits on the hours of operation where the lighting would have an adverse impact on residential areas.

Policy DM 8: Residential extensions, conversions and redevelopment within the built up area

CPRE Kent supports this policy

Policy DM 9: Residential premises above shops and businesses

CPRE Kent supports this Policy, but we consider that some further guidance should be given in regard to point 2. As it stands, planning permission will be granted as a matter of course, but there could be instances where this should not be the case, e.g. where it might impact on the continued viability or operation of the shop.

Policy DM 10: Residential Garden Land

CPRE Kent supports this Policy

Policy DM 11: Housing Mix

CPRE Kent fails to see in what way bullets 1,2 and 6 of this Policy actually comprises a development management policy that provides guidance to prospective developers, as it seems to be a statement of strategy. As it stands the Policy serves no purpose or help for development management purposes, and needs to be recast as a development management policy.

Policy DM 12: Density of Housing development

CPRE support the intention to provide guidance on density, as we believe this will help to ensure the efficient use of land. However, we consider that some amendments should be made to the Policy as follows:

In point 1 we consider that the density range is too wide. We also note that contrary to the guidance given in this part of the Policy some sites proposed for allocation are actually proposed at a density higher than 200 dph. Therefore, in point 1 we would rather see more general guidance rather than specific densities expressed. Such advice should seek to ensure development at the highest possible density, but having regard to impact on townscape and the historic fabric of the area concerned.

With regard to points 2 and 3, we agree with the densities suggested, but in both we would suggest that the words *"at least"* are inserted before the density figure.

In point 2 the words *"At sites adjacent to"* are replaced by *"In"*. It is inappropriate to suggest that other (presumably unallocated) sites outside of the defined urban area may be considered for development, given that all allocated sites will be included within the urban area.

For the same reason, the words *"or adjacent to"* should be deleted from point 3.

In the final paragraph, the words *"other settlements"* should be replaced by *"the villages"* and again the words *"at least"* should be inserted before the density figure. We would also suggest that the final sentence is presented as a separate paragraph as it would apply Borough-wide, not just to the other settlements/villages which are the subject of the paragraph as it stands.

Policy DM 13: Affordable housing

CPRE Kent supports this Policy and would like to see the following text included at the end of bullet 6: *"This will be subject to viability evidence."*

The text after bullet 3 and the final paragraph are repeated in Policy DM11 and as the text relates to affordable housing there is no need for the text to be repeated in policy DM11.

Policy DM 14: Local needs housing

CPRE Kent generally supports this Policy, and that bullet 5 include 'the Metropolitan Green Belt' and include the following at the end of the bullet:

"Appropriate landscaping will be provided where necessary to mitigate impact."

Policy DM 15: Nursing and Care Homes

CPRE Kent supports this Policy. Nursing and care homes will result in trips from delivery vehicles and ambulances and hospital passenger transport vehicles. It will be important that sufficient space is provided on site for delivery vehicles and ambulances to turn and park en-site and bullet 2 should provide for this.

Policy DM 16: Gypsy, Traveller and Travelling Showpeople accommodation

CPRE Kent does not support this Policy see our response to Policy GT1..

Policy DM 17: Town centre uses

CPRE Kent supports this Policy.

Policy DM 18: District centres, local centres and local shops and facilities

CPRE Kent supports this Policy, but point 4 should also include community uses in the same way that points 1 and 2 do.

Policy DM 19: Signage and shop fronts

CPRE Kent supports this Policy and considers that the policy should be extended to include notice and advertising boards / hoardings.

Policy DM 20: Economic development

CPRE Kent fails to see in what way this Policy actually comprises a development management policy that provides guidance to prospective developers. It seems to be a list of economic development objectives, many of which are included in the earlier parts of the Plan. As it stands the Policy serves no purpose or help for development management purposes, and needs to be recast as a development management policy.

Policy DM 21: Retention of employment sites

CPRE Kent supports this Policy

Policy DM 22: Open space and recreation

CPRE Kent supports this Policy

Policy DM 23: Community facilities

CPRE Kent supports this Policy

Policy DM 24: Sustainable transport

CPRE Kent fail to see in what way parts 1 and 2 of this Policy actually comprise a development management policy that provides guidance to prospective developers. These seem to be expressions of strategy that would be more at home in Chapters on Spatial Strategy and the Spatial policies than here. We would suggest that the construction of the Policy is reviewed or these parts comprise an 'SP' Policy and moved to earlier in the Plan.

Policy DM 25: Public Transport

CPRE Kent fails to see in what way part 1 of this Policy actually comprise a development management policy that provides guidance to prospective developers. This seems to be expressions of strategy that would be more at home in Chapters on Spatial Strategy and the Spatial policies than here. We would suggest that the construction of the Policy is reviewed or this part is included as an 'SP' Policy and moved to earlier in the Plan, perhaps combined with parts 1 and 2 of Policy DM13 to create a strategic policy on transport.

Policy DM 26: Park and Ride

We previously responded to the policy as follows:

'The provision of new park and ride facilities should only be considered where existing public transport services cannot be improved. This is to prevent users of existing public transport serving rural areas

and communities driving to park and ride facilities and as a consequence reducing the viability of rural bus services.

'New facilities should be located on brownfield sites.'

The Regulation 19 document has deleted the paragraph setting out the criteria that new park and ride facilities should meet.

Policy DM 27: Parking Standards

This is a new policy and Appendix which has not been out on public consultation and only relate to residential developments.

Policy DM 28: Renewable and low carbon energy schemes

CPRE Protect Kent generally support this Policy, but we suggest that it be re-worded as follows:

"Applications for larger scale renewable or low carbon energy projects will not be permitted if they are located in the Kent Downs AONB or in the setting of the AONB or involve land that is classified as being the best and most versatile for agricultural purposes.

Elsewhere, proposals will be permitted provided there is no unacceptable impact on:

- 1. the landscape;*
- 2. heritage assets and their setting;*
- 3. the amenities of local residents;*
- 4. the local transport network; and*
- 5. ecology and biodiversity, including the identification of measures to mitigate impact and provide ecological or biodiversity enhancement.*

In the case of wind turbines, [in addition to 1 to 5 above] consideration will be given to the impact on:

- i. Air traffic and safety;*
- ii. Defence installations and operations;*
- iii. Other radar installations; and*
- iv. Electromagnetic transmissions.*

In all cases, regard will be given to the cumulative impact of such proposals in the local area."

Policy DM 29: Electronic Communications

CPRE Kent supports this Policy but we would wish to see point 2 redrafted as follows:
"equipment is sited so as to minimise impact on the natural and historic environment;"

Policy DM 30: Mooring facilities and boat yards

CPRE Kent supports this Policy.

Policy DM 31: Primary shopping frontages

CPRE Kent supports this Policy.

Policy DM 32: Secondary shopping frontages

CPRE Kent supports this Policy, but we consider that it should also allow residential development as well.

Policy DM33: Leisure and community uses in the town centre

CPRE Kent supports this Policy.

Policy DM34: Design principles in the countryside

CPRE Kent support this Policy subject to the opening paragraph being amended to read as follows:

“Development in the countryside which is acceptable under Policy SP17 should be of a high quality of design and meet the following criteria:”

Policy DM 35: Conversion of rural buildings

‘CPRE Kent supports this Policy.’

Policy DM 36: Rebuilding and extending dwellings in the countryside

CPRE Kent supports this Policy.

Policy DM 37: Change of use of agricultural land to domestic garden land

CPRE object to this Policy as we consider that it is too permissive and open ended. We consider that the presumption should be against such expansion of domestic gardens and that this should be seen as unacceptable development in the countryside. The Policy should be deleted and proposals should fall to be considered under Policy SP17.

Policy DM 38: Accommodation for agricultural and forestry workers

CPRE Kent supports this Policy.

Policy DM 39: Live-work units

CPRE Kent supports this Policy.

Policy DM 40: New agricultural buildings and structures

CPRE Kent supports this Policy.

Policy DM 41: Expansion of existing businesses in rural areas

CPRE Kent would wish to see additional criteria in regard to restricting lighting.

Policy DM 42: Holiday caravan and camp sites

CPRE Kent would wish to see additional criteria in regard to:

1. Development in the AONB being unacceptable;
2. Outside the AONB, no adverse impact on landscape character;
3. Restricting lighting

Policy DM 43: Caravan storage in the countryside

CPRE Kent considers that this is a very detailed issue which does not warrant its own development management policy. Any proposals for this use can be considered against other general development management policies and the NPPF. The Policy should be deleted.

Policy DM 44: Retail units in the countryside

CPRE Kent supports this Policy and considers that it would be helpful to provide a definition of a ‘significant proportion’ in point 1i.

Policy DM 45: Equestrian development

CPRE Kent supports this Policy.

Policy ID 1: Infrastructure Delivery

CPRE Kent generally support the approach to infrastructure delivery set out, but we do not consider that it is appropriate to provide a list of priorities as included in point 4. We consider that this ‘one size fits all’ approach to infrastructure planning is inappropriate and that each case/site should be dealt with on its merits and in the light of the demands/needs of the particular location. Additionally, we are concerned that the list of priorities is very limited/specific in its scope and does not include general social and community services and facilities. Consequently, we consider that point 4 should be deleted