

Maidstone Borough Local Plan
Regulation 18 Consultation 2014

Response from CPRE Protect Kent



May 2014



CPRE Protect 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.

This response has been prepared jointly by the Kent Branch office of CPRE Protect Kent and by the Maidstone District Committee of CPRE Protect Kent, but for brevity our comments are expressed as being from 'CPRE Protect Kent' throughout this response.

Chapter 1 – Introduction

No comment

Chapter 2 – Key Influences

<p>Policy NPPF 1</p>	<p>CPRE Protect Kent object to the inclusion of this Policy in the Plan, as we consider it is neither appropriate or necessary for the following reasons:</p> <ol style="list-style-type: none"> 1. Paragraph 14 of the NPPF explains that the presumption in favour of sustainable development is at the heart of the NPPF and that it is the 'golden thread' running through both plan-making and decision-taking. It is clear from the NPPF that the presumption in favour of sustainable development is not to be achieved simply by compliance with a single local plan policy. Compliance is a matter for the plan as a whole. Given that it is one of the tasks of the Inspector examining the plan to consider whether or not the plan is consistent with national policy, specifically to ensure that the plan enables <i>"the delivery of sustainable development in accordance with policies in the framework"</i> (paragraph 182 of the NPPF), we find it difficult to see the need for a specific policy on the presumption. If the plan taken as a whole fails to accord with the NPPF - especially the 'golden thread' running through it - the Inspector will find it unsound or will recommend that modifications are made to it. Simply by putting into the plan a policy on the presumption does not make it compliant with the NPPF if the policies and proposals in the plan are not so compliant. 2. We are very concerned that this Policy is in effect being imposed on the Borough Council with the prospect that the plan will not be sound without it. We believe that this is contrary to the principle of 'localism' and conflicts with the notion that local plans are <i>local</i> plans. We are very surprised that in the wake of the Localism Act, the purpose of which is to devolve more decision making to the local level, that such a top-down approach to plan making is being taken.
-----------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>3. It is of concern to us that the Policy simply seeks to restate the presumption as included in the NPPF. It has been longstanding practice in plan making, in order to help ensure that plans are as succinct as possible and locally distinctive, that national policy is not repeated in plans. Indeed, the final sentence of paragraph 2.2 of the draft Plan clearly states that it does not repeat national policy, however this is exactly what Policy NPPF1 does.</p> <p>4. It is of particular concern to us that the inclusion of the Policy, which seeks to ensure that development is approved wherever possible, does not include all the detailed aspects of sustainable development as set out in the NPPF. Consequently, it undermines the proper role of the local development plan in setting out policies that seeks to deliver sustainable development in an integrated and balanced way.</p> <p>For these reasons we do not consider that the Policy is needed or appropriate and it should not be included in the plan.</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Chapter 3 – Spatial Portrait

<p>Para. 3.6</p>	<p>Whilst there still seems to be some commitment in Government towards the concept of the Thames Gateway, neither it nor Ashford are now formally designated as growth areas, in the same way that Maidstone is no longer a designated growth point. Both growth areas and growth points were features of the pre-localism agenda and were rescinded with the demise of the South East Plan. Consequently, the sentence that refers to increased pressure to compete with nearby growth areas should be deleted from the Plan.</p>
<p>Key local issues</p>	<ol style="list-style-type: none"> 1. CPRE Protect Kent generally agrees with the key local issues listed, but we consider that delivery will not just be through the Local Plan. This should be made clear in the Plan. 2. 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 some of the Rural Service Centres, especially Marden and Staplehurst, 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). If these are important key issues then proposals in the Plan need to better relate to them. 3. We consider that an additional key issue should be included that recognises the importance of the countryside generally 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.

<p>Spatial vision</p>	<p>CPRE Protect Kent generally agrees with points 1, 3, 6, 8, 9, 10 & 11 of the vision, but we would make the following comments on other points:</p> <p><u>Point 2:</u> At the present time the Council does not have an agreed Integrated Transport Strategy (ITS), and thus we find it difficult to see how the Plan can be prepared with this part of the vision in mind. How can it be known that the plan strategy and the selection of the proposed development sites has been guided by, and will secure the delivery of, the ITS when it is not yet in place? In reality, it is more likely to be the case that the ITS will be responding to the development strategy and proposed sites rather than the other way round as suggested in the vision. Consequently, we consider that this part of the vision is misleading.</p> <p><u>Point 4:</u> We would question what is meant by '<i>suitable development</i>' 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 '<i>suitable</i>' and in what way it would reinforce their role. 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.</p> <p><u>Point 5:</u> 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?</p> <p><u>Point 7:</u> Whilst we agree with this, the expansion of employment skills is not a matter that the Local Plan can achieve and so this part of the vision is entirely aspirational.</p>
<p>Spatial objectives</p>	<p>CPRE Protect Kent has the following comments on the objectives:</p> <p><u>Point 1:</u> We accept that it should be an objective of the Plan to provide for new development opportunities, but we fail to see how in doing so an emphasis can be placed on increasing skills and learning. This is purely aspirational as the market will dictate the precise nature of the use to which particular sites will be put, and thus the skills that will be demanded from the workforce.</p> <p><u>Point 2:</u> We fully agree and support the objective of focusing development within the Maidstone urban area, and agree that there is scope for some development at the rural service centres and the larger villages – though we are extremely concerned that the scales of development proposed at some of the rural service centres, especially</p>

Marden and Staplehurst, 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.

In the case of the larger villages development potential should be expressed as *'very limited'*.

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

As we explain in more detail elsewhere in this response, we do not agree that Yalding should be defined as a larger village or that strategic development locations should be identified.

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 to meet development targets. Again we comment in more detail on this elsewhere in our response.

Point 3: No comment

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

Point 5: The villages referred to need to be defined in the Plan – see our comments on the settlement hierarchy. We assume that this objective is essentially concerned with the provision of local needs housing, which will be provided primarily through the use of the exceptions policy. If this is so, it is an objective that should also apply to the rural service centres and the larger villages.

Point 6: We consider that this objective should be split into two, as follows:

“To safeguard and maintain the character, quality and tranquillity of the Borough’s countryside, recognising in particular the need to conserve and enhance the Kent Downs Area of Outstanding Natural Beauty.”

And

“To facilitate the economic and social well-being of the rural areas.”

Point 7: No comment

Point 8: We agree with this objective, but consider that to reflect the *'high quality'* reference made in point 9 of the vision that the objective should seek generous space standards for residential developments.

Point 9: No comment

Point 10: No comment

Point 11: No comment

Chapter 4 – Spatial Strategy

<p>Para 4.1</p>	<p>We note that in paragraph 6.13 of the Plan it is stated that the future housing requirements will be met through making the best use of previously developed land before releasing greenfield sites for development in order to protect the borough's valuable landscape and biodiversity assets. We strongly support this statement, but it is one that should be given more prominence in the Plan as part of the spatial strategy. Consequently, this spatial approach to development should be included at the outset in para 4.1 and in Policy SS1.</p>
<p>Objectively Assessed Housing Need</p>	<p>CPRE Protect Kent objects to basing the Plan on an objectively assessed housing need target of 19,600 dwellings.</p> <p>There is an undoubted need to provide accommodation for our growing population. This is projected to rise due to the increase in life expectancy, which has been taken as continuing at the rate of the last two decades, and estimates of net migration based on historic levels, although the Government is looking to reduce this. The national projections are for the UK as a whole to increase by 12.5% between 2011 and 2031, but slightly higher in England and the southeast region at 13.5%.</p> <p>Historically housing in the southeast was quantified by RPG9 (1994). We believe that this represented the Government's assessment of need. It originally showed a requirement of 40,000 new dwellings per year excluding London, but which was revised downwards in 2000 to 39,000. Of these Kent would be required to provide 5,700 per year (15.5% of the regional amount). In the meantime Maidstone had put itself forward as a "growth point", a Government scheme that gave financial rewards to high levels of housebuilding. This did not last long but appears to have set Maidstone on a course of high amounts of housebuilding.</p> <p>The RPG9 allocated Maidstone a total dwelling requirement of 7400 from 1991 to 2006 (15 years), which meant 493 dwellings per year. This was superseded by the 2000 Maidstone Local Plan which increased the number to 10,080 for 20 years, which gave 504 dwellings per year, and subsequently increased by the South East Plan, apparently somewhat arbitrarily, to 11,080 by 2026, needing 554 dwellings per year. These alternating requirements we calculate meant that between 2001 and 2013 (13 years) the planned number was 6287, which is a similar figure to that in the SHMA report table 17, page 72, of 6178.</p> <p>That table also provided the figure of 8091 completions, although we calculate that from 2000/1 to 2012/3 some 8417 dwellings were completed. Either way, completions were of the order of 2000 above the planned numbers. Because of this the projected numbers from 2013 onwards have naturally, but unfortunately, been calculated as continuing at this inflated rate. However we have no explanation as to why the</p>

projected rates are still so very much higher than even than this inflated rate. However using the SHMA figures of over production, if the 19,600 is reduced in proportion to the excess number of completions compared to the planned numbers, (i.e. 19,600 times 6178, divided by 8091) the result is 14,966 dwellings. This is close to the figures produced by KCC Research and Evaluation which resulted in an initial adoption of 14,800 by MBC. This then gets Maidstone back on track to the original planned approach. However we believe that some credit should be taken by Maidstone for its over production, and would propose that at least 1000 be taken away from 14,966 to give a realistic target of **14,000** dwellings for the Plan period.

In this period to 2011/2 the Kent figure of 5700 per year proposed by RPG9 is reasonably close to the actual number of completions across the county (10 year average) of 5642 or 6371 including Medway. This disparity between the performance of Maidstone and Kent/Medway explains why they have such different future growth rates.

The SHMA does not make any allowance for windfall sites. These will be applications for sites for single or very few houses, conversions of offices, shop space and barns etc., to dwellings (which have been recently made much easier to achieve by the Government) and larger sites arising but not already included, which cannot be identified in the Local Plan. These will undoubtedly occur, and KCC published the annual numbers of these until 2007/8. The actual number is likely to be at least around 200 per year, making 4000 in the period 2011 to 2031. However we regard a lower number than this as being very safe, say 125 per year, which gives a figure of 2500 in the period. This reduces the 14,000 figure to a residual requirement of 11,500 dwellings. We believe it to be perverse not to allow for windfalls.

In respect of some of the detailed figures in the SHMA:

- Net migration is wholly dependent on the number of dwellings being built, after allowing for the number needed by the growth of the existing population. The SHMA does not include any graph of net migration, only composite graphics included as figures 32, page 92, and 33, page 95. These appear to have little relationship to the figures in Maidstone's Annual Monitoring Report. Even so it can be seen that net immigration follows the rate of completions. It cannot be that net immigration in any way requires or determines how many houses are built, but is a number MBC can decide for themselves
- The average household size (table 25 page 97) is a simple measure of households divided by the number of houses. It is not seen anywhere as a target. It means that over the years we have built more houses than were needed to meet the population growth

	<p>(a mathematical fact and not an opinion), and probably partly reflects the increasing age of the population, moving to 1 or 2 person units compared with 3 person or more. It has apparently remained constant at 2.45 persons per household since 2001 and we see no evidence to say that it will resume its previous downwards trend at this time.</p> <ul style="list-style-type: none"> - It is widely understood that there is a growing number of older people in the population and a reducing number of the young. This is of concern to the pension industry, the NHS and others but seems to have been ignored by the housebuilding industry. A look at the Maidstone population breakdown shows that, apart from an alarming rate of reduction of those over 60, the average percentage of those between 35 and 60 is about 3.5% per 5-year group, but it falls to about 3% for those younger than this. This indicates that if we move on progressively over 20 years the “house needing” numbers will reduce. This effect will counteract to an extent the additional requirement for housing due to increased life expectancy <p>The overall effect of these points is to reduce further the potential housing target from even 11,500 by possibly another 1000, leaving a further reduced residual target of 10,500 dwellings. After having regard to completions and extant planning permission (4,200 dwellings) sites will need to be found for around 6,300 dwellings.</p>
<p>Para 4.3</p>	<p>We would make a number of points as follows:</p> <ol style="list-style-type: none"> 1. The National Planning Policy Framework (NPPF) paragraph 159 says that Local Authorities should prepare a Strategic Housing Market Assessment (SHMA) to assess their housing needs. This should include meeting household and population projections taking account of migration and demographic change. Maidstone Borough Council (MBC) contracted Messrs G L Hearn to undertake this work. <p>Household and population projections are produced by both the Office for National Statistics (ONS) as the original source and the Department of Communities and Local Government (DCLG) as a user department. Both of these departments stress that their figures are projections of recent past performance, and are not forecasts, and should not be used as such.</p> <p>G L Hearn, however, used the DCLG projected figures in order to forecast a need for 19,600 dwellings to be built between 2011 and 2031. This figure is hugely out of proportion to the actual past performance. They fail to recognise that, or explain why Maidstone Borough should need to add 30% to its existing housing stock, why it should have twice as much development as the rest of Kent, and why on average the rate of annual completions should rise from some 650</p>

dwellings per year to over 1000 (980 average, but now with a shortfall of 457 from lower completions in 2011/2 and 2012/3). This figure has been taken by MBC not only as a forecast but as a definitive target.

It is important to note that the NPPF paragraph 159 says the SHMA is used to “assess” housing need, not to determine it. It should be a tool in the assessment and not an end in itself. The National Planning Practice Guidance (NPPG) under the paragraph ‘What is the definition of need?’ states: *“Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.”*

The result of using projections as evidence to assess “need” leads to the bizarre - and surely unintended – result that any local authority which has a high number of housing completions in recent years (irrespective of the number of planning approvals) will have created a high level of “need”, whereas a low number of completions will apparently result in a low level of “need”. This is the reverse of what is required.

CPRE Protect Kent believes, therefore, that the G L Hearn report should be rejected as not being proportionate. We regret that MBC has apparently accepted unquestionably their figure as a target. We note the almost complete absence of any form of proper assessment of the background or basis of need, and how it arises.

However the report does include on page 72, table 17 the statement that in the years 2001 to 2013 the planned supply was 6,178, whereas the actual delivery was 8,091. Therefore had the completions actually matched the planned supply the projections would have reduced in due proportion, and the 19,600 reduced to 14,966.

We are in the process of developing our detailed view on the real figures of need, but as a first estimate we think that around 14,000 dwellings is likely to be realistic, as we explain in our comments on the objectively assessed housing need.

2. It is usual practice in a Local Plan for the sources of housing land supply to be presented in tabular form, and we would suggest the inclusion of a table along the following lines rather than including the figures in the paragraph as currently:

Dwellings built since 2011	*****
Dwellings with planning permission at March 2014	*****
Windfalls (2016–31 – see comment below)	*****
Sites allocated in the Local Plan	*****
Total supply/target	*****

3. We note that no allowance is made for windfalls in contributing to housing supply. Paragraph 48 of the NPPF specifically allows an allowance for windfall sites to be made provided there is *“compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.”* In the context of this, the NPPG advises that *“local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area.”*

In the past Maidstone Borough has secured significant development from windfall sites and we can see no reason why such sites will not continue to provide a significant supply during the Plan period. We are not aware of any recent monitoring of windfall rates, but from the last comprehensive monitoring report on the topic prepared by Kent County Council in 2008, windfalls comprised an average of 282 dwellings per year between 2001 and 2008 in Maidstone Borough. Based on this past performance, and we appreciate that it will be necessary to have regard to more recent data that we do not have access to, windfalls could yield some 4,000 dwellings in years 6-15 of the Plan period. This is a significant supply which should not be ignored in the Plan. We would, therefore, strongly urge the Council to include a windfall allowance in the Plan.

4. It would also be appropriate for the Plan, as part of its spatial strategy, to show how the overall housing target will be met spatially in accordance with the settlement hierarchy. Consequently the Plan should show how many dwellings will be provided in Maidstone town centre; the rest of the Maidstone urban area; the rural service centres (in total and individually); and the larger villages (in total and individually).

In regard to the latter two locations, and reflecting the comments we make on points 4 and 5 of the Spatial Vision in Chapter 3 of the Plan, we consider that the sub-targets set should be justified in terms of the Spatial Vision and the intentions of Policy SS1. Consequently, for the rural service centres the Plan needs to define how much development will be necessary to *‘reinforce’* their role and for the larger villages how much development is needed to *‘maintain’* their role. The approach currently employed in the Plan seems to relate more to available development opportunities rather than to development needed to fulfil the Vision.

5. Allied with this last point, we are extremely concerned that the Local Plan is overriding work being undertaken by local communities in preparing Neighbourhood Plans. We are aware that Neighbourhood Plans are being prepared for all of the rural service centres and given this the Council should have regard to how Neighbourhood Plans can complement the Local Plan strategy to deliver the necessary

	<p>development required, rather than imposing sites on local communities.</p> <p>6. We also consider that the whole process is flawed by the absence of information or workings on the associated infrastructure, especially the Integrated Transport Strategy, to match the housing developments. MBC have not acted in accordance with NPPF, particularly paragraphs 154,155,156 and 157.</p>
<p>Paras. 4.5 to 4.7: Employment requirement</p>	<p>1. CPRE Protect Kent welcomes the revised employment requirement figures for office (B1), industry (B2) and warehouse (B8) uses. We believe that this provides a more realistic assessment of future employment needs to be planned for. We note, however, that further work is required to meet the office requirement and await further consultation on the outcome if this work.</p> <p>2. In addition to the provisions to be made for these traditional employment uses the Plan also seeks to make a significant provision for 'medical'. This accounts for approximately half of the floorspace provision to be made in the Plan for employment purposes. 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, 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. This should be clarified in the Plan.</p> <p>Notwithstanding this, we are concerned that a great reliance is being placed on this one employment proposition. In particular, given its location next to the M20 Motorway, we would question the likelihood that the jobs to be provided at this site will be taken by local people, especially the higher skilled jobs.</p>
<p>Paras 4.9 to 4.11: Gypsy and Traveller pitch requirement</p>	<p>CPRE Protect Kent recognises that there is a clear demand for traveller sites in the Borough. However the numbers included in the Draft Local Plan (187 by 2031), which are derived from the assessment (GTTSA) carried out by members of Salford University during 2011 (final report January 2012) have been superseded and made out of date by the DCLG 'Planning Policy for Traveller Sites' issued in March 2012.</p> <p>The Salford study was carried out under the requirements of the 2004 Housing act. This defined the persons or families who were to be considered as having the rights to a site as being:</p> <p>a) persons with a cultural tradition of nomadism or of living in a caravan; and</p> <p>b) such persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to</p>

*travel temporarily or permanently; and
c) members of an organised group of travelling showpeople or circus people (whether or not travelling together).*

This definition was changed for planning purposes by DCLG in March 2012 to be:

“Persons of a nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependant’s education or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

The report carried out by Salford University, which was appropriate at that time, very much concentrated on those people defined under the paragraph a) above in 2004. The information gathered was comprehensive and gave a reasonably full picture of the settled traveller community, including figures on possible future household formation, and concealed households. The report did not specify that the people involved were ethnic minorities (as defined by the Mandla criteria) but the backgrounds very much indicated this.

The change of definition in the DCLG March 2012 policy (foreshadowed by the 1/2006 document) puts a very different emphasis on who is eligible for consideration for a traveller site. It is no longer relevant to be of ethnic i.e. gypsy stock. The essence is that the person or family applying must be actually living a nomadic life. The effect of this is to make the figures produced by the Salford study now only marginally appropriate. The study needs to be looked at on a different basis, or redone.

Under the Race Relations Act 1975 and subsequent amendments (including 2000) it is unlawful to discriminate against anyone on the grounds of race, colour, nationality or ethnic or national origin. All ethnic/racial groups are protected against discrimination. Public authorities have both a general and specific duty to eliminate unlawful racial discrimination, and this is recognised in the change of definition above. This makes the wording of paragraph 9.2 in particular, at best inappropriate, or possibly illegal. The word “Gypsy” must be replaced by “traveller”.

As the Salford study states, the requirement for sites under the 2004 Act will result in a continuously increasing demand. The revised definition is more likely to stabilise the situation as the number of people or families living a nomadic life can be gradually catered for.

<p>Para 4.12: Settlement hierarchy</p>	<ol style="list-style-type: none"> 1. CPRE Protect 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. 2. Also, and to complete the hierarchy, the final category should include 'the countryside' and the many very smaller rural communities for which not settlement boundary is defined and where development will not generally be acceptable. 3. 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.
<p>Para 4.15</p>	<p>CPRE Protect Kent does not consider that the locations identified in this paragraph are strategic in nature, and this terminology should be removed from the Plan. The two housing locations comprise a collection of individual sites that are in different ownerships and which are separately allocated in the Plan. The Plan does not propose that they will be developed as a single strategic proposal in a coordinated way, and so to suggest that they possess some strategic credentials is misleading. Similarly, the strategic location at Junction 7 also comprises two distinct and unrelated development proposals.</p>
<p>Paras. 4.18 & 4.19</p>	<p>CPRE Protect Kent welcome these paragraphs, but would wish to see the following changes:</p> <ol style="list-style-type: none"> 1. In the first sentence of para 4.18 insert '<i>tranquillity</i>' after the word '<i>quality</i>'. 2. In the final sentence of para 4.18 delete the word '<i>unacceptable</i>'. As a concept, coalescence is something that either does or doesn't occur as a result of development and the idea that coalescence may be acceptable is a misnomer.
<p>Paras 4.21 to 4.23</p>	<p>As we have explained elsewhere in our representations, CPRE Protect Kent strongly objects to a housing target of 19,600 dwellings and we consider that this should be reduced to 14,000. Consequently, we do not consider that the Council has appraised all feasible and realistic alternatives as required by the NPPF.</p> <p>We find it concerning, as stated in para 4.22 of the plan, that a housing target of 19,600 dwellings could result in an oversupply of housing</p>

	<p>compared to the level of jobs planned for. Part of the assessment of objectively assessed housing needs is to provide a balance between housing needs and employment growth. If, as seems to be the case, a housing target of 19,600 will create an imbalance, then it is clearly the wrong target.</p>
<p>Para 4.24</p>	<p>CPRE Protect Kent welcome the rejection of option A, which would have seen significant employment development around Junction 8 of the M20 Motorway. This, as acknowledged in para 4.27 would have a significant and unacceptable impact on landscape character and the setting of the AONB, as well as having other damaging environmental impacts.</p>
<p>Policy SS1</p>	<p>CPRE Protect Kent object to Policy SS1 for the following reasons:</p> <ul style="list-style-type: none"> • <u>Point 1i</u>: That a housing target of 17,100 (in fact actually 19,600) is too high for the reasons we explain elsewhere in our response to the Plan. • <u>Point 1v</u>: That 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, as we explain in our response to paras 4.5 to 4.7. • <u>Point 2</u>: That provision for 187 Gypsy and Traveller pitches and 11 Travelling Showpeople plots is too high as we explain in our response to paras 4.9 to 4.11. • <u>Point 3</u>: That because the housing target is too high, and because no allowance is made for windfall development, not all of the sites identified for development on the Policies Map are needed - see our comments on the individual sites. It would also be appropriate here to include the intention stated in paragraph 6.13 of the Plan, i.e. that future housing requirements will be met through the best use of previously developed land before releasing greenfield sites for development in order to protect the borough's valuable landscape and biodiversity assets. • <u>Point 4</u>: That the reference to '<i>strategic locations</i>' be deleted for the reasons we explain in our response to para 4.15. • <u>Point 5</u>: That Harrietsham be deleted as a rural service centre, as we explain in our response to para. 4.12 and that reference be included to the role of Neighbourhood Plans in delivering proposed development at the rural service centres, as we explain in our response to para 4.3. • <u>Point 6</u>: That Yalding be deleted as a larger village, as we explain in our response to para 4.12 and that reference be included to the role of Neighbourhood Plans in delivering proposed development at the larger villages, as we explain in our response to para 4.3. • <u>Point 7</u>: That the future locations for significant housing growth be deleted from the Policy as explained in our response to Policy H3 and its supporting text.

	<ul style="list-style-type: none"> • <u>Point 9</u>: Delete the words <i>“In other locations”</i>. • <u>Point 10</u>: A number of changes should be made to this point, as follows: <ul style="list-style-type: none"> ➤ Delete the word <i>“generally”</i>. ➤ Add <i>“and enhanced”</i> after <i>“maintained”</i>. ➤ Delete <i>“of local value”</i>. • The Policy should also contain an additional point on the countryside, reflecting para 4.18 of the supporting text. We would suggest: <p><i>“The intrinsic character and beauty of the countryside, including its tranquillity, will be protected.”</i></p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Chapter 5 – Spatial Policies

<p>Policy SP1</p>	<p>CPRE Protect Kent supports this Policy, subject to the following changes:</p> <ul style="list-style-type: none"> • Inclusion of development targets to be accommodated in the town centre area; • <u>Point 1ii</u>: Amend <i>“retail-led”</i> to <i>“mixed-use”</i>. • <u>Point 1vi</u>: Insert <i>“housing and”</i> after the word <i>“including”</i>. • <u>Point 1vii</u>: Replace <i>“Select”</i> with <i>“Maximise”</i>. This point should be presented as point 1ii with the others renumbered accordingly. • <u>Point 1ix</u>: Up-dating the reference to the draft Integrated Transport Strategy. • <u>Point 2i</u>: Include a reference to the need to restrict building heights in the town centre in order to respect townscape and the historic fabric.
<p>Paras. 5.32 to 5.35</p>	<p>These paragraphs are written as though all proposed development is within the defined urban area suggesting a focus on regeneration, when in fact the boundary of the urban area has been expanded to include some significant areas of greenfield land. The text, therefore, needs to be expanded to explain the approach taken to redefining the urban boundary and the respective contributions to be made by brownfield development opportunities and greenfield sites.</p>
<p>Policy SP2</p>	<p>CPRE Protect Kent generally supports this Policy, subject to our comments on individual sites and the following changes:</p> <ul style="list-style-type: none"> • Inclusion of development targets to be accommodated in the defined urban area outside of the town centre area; • <u>Point 1</u>: Replace the word <i>“urban”</i> with <i>“brownfield”</i>. • <u>Point 6</u>: Add the words <i>“, including greenfield sites,”</i> after the word <i>“sites”</i>.

<p>Paras 5.39 to 5.43</p>	<ol style="list-style-type: none"> 1. CPRE Protect Kent does not support the identification of Harrietsham as a rural service centre, as we explain in our response to para 4.12 (Settlement hierarchy). Consequently para 5.39 should be deleted and Harrietsham added to the list of larger villages. 2. For each settlement the amount of development to be accommodated should be given together with a justification as to how it has been determined and how it will achieve the Spatial Vision and the purposes of Policy SS1; i.e. how it will maintain and enhance the service centre role of the village and meet the needs of the local community. 3. The text should also provide commentary on the role that Neighbourhood Plans will play in delivering the identified development quantities.
<p>Policy SP3</p>	<p>CPRE Protect Kent supports this Policy subject to:</p> <ul style="list-style-type: none"> • our comments on paragraphs 5.39 to 5.43; • our comments on the individual sites; and • the inclusion of development targets to be accommodated at the rural service centres.
<p>Paras 5.46 to 5.55</p>	<ol style="list-style-type: none"> 1. CPRE Protect Kent does not support the identification of Yalding as a larger village, as we explain in our response to para 4.12 (Settlement hierarchy). Consequently paras 5.54 and 5.55 should be deleted and para 5.47 amended to remove reference to the village. 2. For each settlement the amount of development to be accommodated should be given together with a justification as to how it has been determined and how it will achieve the Spatial Vision and the purposes of Policy SS1; i.e. how it will maintain the particular role of the village. 3. The text should also provide commentary on the role that Neighbourhood Plans will play in delivering the identified development quantities.
<p>Policy SP4</p>	<p>CPRE Protect Kent supports this Policy subject to:</p> <ul style="list-style-type: none"> • our comments on paragraphs 5.46 to 5.55, including the removal of Yalding as one of the defined larger villages; • our comments on the individual sites; and • the inclusion of development targets to be accommodated at the larger villages
<p>Additional Policy</p>	<p>In accordance with our comments on para 4.12 (settlement hierarchy) a new Policy is needed to cover the 'missing' part of the hierarchy – i.e. the villages and the countryside. With regard to the villages, this could embrace paragraphs 5.62 and 5.64 to 66 with the Policy covering the issues raised in these paragraphs. Village boundaries will need to be defined for the villages falling in this category. With regard to the countryside, and the very small settlements for which no boundaries</p>

	<p>should be defined, this should explain that development will not be permitted, other than in accordance with Policy SP5, in order to protect the intrinsic quality and character of the countryside.</p>
Para 5.57	<p>1. Amend the first sentence to read as follows:</p> <p><i>“The countryside is defined as all those parts of the plan area outside the defined settlement boundaries and is depicted on the policies map.”</i></p> <p>2. In the second sentence after “intrinsic character” add “, including tranquillity,”.</p>
Para 5.63	<p>This paragraph should be re-worded as follows:</p> <p><i>“A small area to the west of the borough lies within the Metropolitan Green Belt (MGB), incorporating the villages of Nettlestead and Nettlestead Green. The fundamental aims of the MGB are to prevent urban sprawl and to maintain the openness of the countryside. Proposals for development in the Green Belt will be considered in accordance with the National Planning Policy Framework.”</i></p>
Para 5.69	<p>In the first sentence after “character,” add “tranquillity,”.</p>
Policy SP5	<p>CPRE Protect 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:</p> <p>1. Amend the opening paragraph to read as follows:</p> <p><i>“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.”</i></p> <p>2. <u>Point 1</u>: Amend the opening paragraph to read as follows:</p> <p><i>“Provided proposals do not harm the intrinsic quality and character of the countryside, the following types of development will be permitted:”</i></p> <p>3. <u>Point1ii</u>: Amend point a. to read as follows:</p> <p><i>“Meet a proven essential need for a rural worker to live at or near their place of work in accordance with Policy DM35.”</i></p> <p>4. <u>Point 4</u>: Amend to read as follows:</p> <p><i>“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;”</i></p>

Chapter 6 – Housing allocations and future locations for housing growth

Paras 6.1 to 6.11	<p>Has we have stated elsewhere in our responses on the Plan we do not support the inclusion of Harrietsham as a rural service centre or Yalding as a larger village.</p> <p>We consider that it is inappropriate to identify strategic locations for housing development. CPRE Protect Kent does not consider that the locations identified are strategic in nature, because the two housing locations simply comprise a collection of individual sites that are in different ownerships and which are separately allocated in the Plan in Policy H1. The Plan does not propose that they will be developed as a single strategic proposal in a coordinated way, and so to suggest that they possess some strategic credentials is misleading. This terminology should be removed from the Plan and the text deleted/amended accordingly.</p> <p>We consider that for some of the rural service centres, most notably Marden and Staplehurst, the scales of development proposed are too large and would overwhelm and change the character of the settlements.</p>
-------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Policy H1 – Housing Allocations	
<u>Site</u>	<u>Comment</u>
(1) Bridge Nursery, London Road, Maidstone	CPRE Protect 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.
(2) East of Hermitage Lane, Maidstone	<p>CPRE Protect Kent objects to this development on the grounds of:</p> <ul style="list-style-type: none"> • 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 DM16 (Air Quality) and para 11.88. • this site involves the loss of agricultural land.

<p>(3) West of Hermitage Lane, Maidstone</p>	<p>CPRE Protect Kent objects to this development on the grounds of:</p> <ul style="list-style-type: none"> • 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 DM16 (Air Quality) and para 11.88.
<p>(4) Oakapple Lane, Barming</p>	<p>CPRE Protect Kent objects to this development on the grounds of:</p> <ul style="list-style-type: none"> • 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 6.13 which states that <i>“In all cases development will only be acceptable where schemes are well designed and do not compromise the overall character of the area”</i>.
<p>(5) Langley Park, Sutton Road, Boughton Monchelsea</p>	<p>This site is allocated in the Maidstone Borough-wide Local Plan 2000 for mixed use development having been earmarked for built development in 1993 for industrial usage. No takers for those uses so it is now put forward for housing.</p> <p>In response to the 2012 consultation, CPRE Protect Kent supported the emphasis on housing and this remains our position. However, we consider that the approximate density of 25 dph is too low and should be raised at least 35. Therefore on the 27 net hectares the site would yield an additional 345 dwellings giving a total of 945 dwellings.</p> <p>We support the requirement of community facilities namely a 2FE primary school (60 per year intake for 7 years so 420 pupils).</p>
<p>(6) North of Sutton Road, Otham</p>	<p>This site is allocated in the Maidstone Plan of 2000, which emphasized the importance of the retention of Bicknor Wood. CPRE Protect Kent supports this site for housing development, but we consider that the density could be raised to 35 from 30 per hectare, which would increase the total number of dwellings to 315.</p>

	<p>The requirements for various pedestrian and cycle links is welcomed.</p>
<p>(7) North of Bicknor Wood, Gore Court Road, Otham</p>	<p>CPRE Protect Kent objects to this site, as we did to the 2012 Strategic Sites consultation.</p> <p>The site is, as specified, on the northern side of Bicknor Wood, and so close to site (6) which could be described as South of Bicknor Wood. The present usage is arable farmland and so is green countryside contributing to the food supply and so the land should be protected from built development. The site is poorly mapped, for although the gross site is given as 14 hectares and the net for development as 7 hectares, and the information contains the statement that <i>“an undeveloped section of land will be retained on the eastern part of the site,”</i> this is not shown on the accompanying map, as happens for other sites e.g. H1(9).</p> <p>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.</p>
<p>(8) West of Church Road, Otham</p>	<p>CPRE Protect Kent objects to this site.</p> <p>This is a large site, 16.2 hectares, of agricultural land of which 12.6 hectares are proposed for housing with a density of 35 and a total number of dwellings of 440. Its effect would be to link Downswood, which prides itself in being a parish settlement, surrounded by rural Otham, 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).</p> <p>Access/egress from the proposed estate would be a severe problem The proposal for this to be via Church Road is ludicrous. 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.</p>

	<p>Furthermore there would not be sufficient school places. After consultation with local people and the relevant Parish Councils it might be possible to determine a small housing development. However the proposed large scale development of 440 dwellings is opposed.</p>
<p>(9) Bicknor Farm, Sutton Road, Otham</p>	<p>CPRE Protect Kent objects to this site.</p> <p>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.</p> <p>It is a large site of 26.1 hectares, of which just 9 hectares are being proposed for housing with a density of 35 per hectare and so 335 dwellings. That leaves a large area on the eastern side of the site to be left as undeveloped to retain the parkland setting of Rumwood Court.</p> <p>Comments are as for those for site H1(7) in that housing development proposals for this site are premature and should be opposed at present. On its northern boundary this site abuts H1(7) and part of the southern boundary abuts sites H1 (5 and 6).</p>
<p>(10) South of Sutton Road, Langley</p>	<p>CPRE Protect Kent objects to this site.</p> <p>This is a large site of 47.1 gross hectares and 26.6 net hectares with a proposed density of 35 per hectare yielding 930 dwellings. However, this is a site with some future development potential as it is a golfing driving range and a plant nursery. This is situated immediately east of the Langley Park site, and is opposed by Langley Parish Council as development that is unsustainable in terms of additional traffic on the Sutton Road, regardless of the proposals for highway improvements on the A274 and just swamping the Parish which wishes to retain its rural character and avoid coalescence with neighbouring settlements (in accordance with Policy SS1 (9)).</p> <p>This is an example of the lack of phasing in the Plan as the site, although in the countryside, is not agricultural land and so might be considered for housing development in the future. Perhaps if the transport requirements and other community facilities were to be put in place for the developments already given planning permission (H1 5 and 6) then this site might be the first to be considered for some additional development in south east Maidstone. However in the absence of any delivered transport and other community facilities, this housing development should be opposed as overload.</p>

(11) Springfield, Royal Engineers Road and Mill Lane, Maidstone	CPRE Protect Kent supports this allocation.
(12) Haynes, Ashford Road, Maidstone	CPRE Protect Kent accepts that there is potential to develop this site, but we would question the proposed density because of the greenspace the site provides.
(13) Medway Street, Maidstone	CPRE Protect Kent supports this allocation.
(14) American Golf, Tonbridge Road, Maidstone	CPRE Protect Kent supports this allocation.
(15) 6 Tonbridge Road, Maidstone	CPRE Protect Kent supports this allocation.
(16) Laguna, Hart Street, Maidstone	CPRE Protect Kent supports this allocation.
(17) Barty Farm, Roundwell, Thurnham	<p>CPRE Protect Kent objects to this site.</p> <p>This is a greenfield site of 3.9 hectares, in the countryside, currently used for agriculture, of which 3.5 hectares is proposed for housing at a density of 35 dwellings per hectare giving a total of 122 dwellings. 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 DM9 on good design.</p> <p>Furthermore:</p> <ul style="list-style-type: none"> • the access/egress would be poor, along a long, narrow lane; • there would be no school places within several miles for any children who came to live on the estate; • 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; • development criteria statement “9. <i>Appropriate contributions towards improvements to secure vehicle and cycle parking at Bearsted railway station</i>” is farcical as such improvements have been sought for many years and none have been forthcoming.
(18) Whitmore Street, Maidstone	CPRE Protect Kent supports this allocation.

(19) North Street, Barming	No objection
(20) Postley Road, Tovil	<p>CPRE Protect Kent objects to this site on the grounds of:</p> <ul style="list-style-type: none"> • 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 6.13 states that <i>“In all cases development will only be acceptable where schemes are well designed and do not compromise the overall character of the area”</i>. • 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 probably migrated onto this land.
(21) Kent Police HQ, Sutton Road, Maidstone	CPRE Protect Kent supports this allocation.
(22) Kent Police training school, Sutton Road, Maidstone	CPRE Protect Kent supports this allocation.
(23) New Line Learning, Boughton Lane, Loose	CPRE Protect Kent objects to the allocation of this site as it will close an important open gap in the urban area.
(24) West of Eclipse, Maidstone	<p>CPRE Protect 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.</p> <p>This is an extension of built development into the open countryside, currently used for grazing livestock, and seems unwarranted. 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.</p>
(25) Tongs Meadow, West Street, Harrietsham	CPRE Protect Kent would like to highlight the ecological sensitivity of this site in respect of the adjoining wetland areas (near Holm Mill) and would like to suggest that the land to the west is retained as public open space.
(26) South of Ashford Road, Harrietsham	<p>CPRE Protect Kent objects to this site for the following reasons:</p> <ul style="list-style-type: none"> • 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. • It does not make any sense to extend the village on both sides of the A20 as it renders the A20 redundant

	<p>as a bypass and will inevitably create stop/go traffic problems. This will bring:</p> <ul style="list-style-type: none"> - more noise - more pollution, with the associated health risks for the people of Harrietsham - more fuel consumption - consequent impact on the fragile local environment. <ul style="list-style-type: none"> • 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). • The A20 is heavily used by articulated lorries, which can access and leave Lenham storage only via Harrietsham. • We do not consider it a safe option to create another entry point onto the A20 directly behind the railway bridge, as there are already several roads joining the A20 on both sides: <ul style="list-style-type: none"> - Church Street north and south, - West Street/ East Street - Fairbourne Lane - Hook Lane - plus 3 access points to and from small scale developments.
<p>(27) Mayfield Nursery, Ashford Road, Harrietsham</p>	<p>CPRE Protect Kent objects to the use of this site for residential development on the grounds that :</p> <ul style="list-style-type: none"> • the site lies well outside of the core village with its facilities. • safe pedestrian or cycle access to the village would be extremely difficult. • the site would create yet another access point onto the A20 • 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.
<p>(28) Church Road, Harrietsham</p>	<p>CPRE Protect Kent objects to this site for the following reasons:</p> <ul style="list-style-type: none"> • 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

	<p>by-pass is a measure which serves the improvement of the quality of life of the villagers and traffic users.</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> - more noise - more pollution, with the associated health risks for the people of Harrietsham - more fuel consumption - consequent impact on the fragile local environment. • 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). • The A20 is heavily used by articulated lorries, which can access and leave Lenham storage only via Harrietsham. • We do not consider it a safe option to create another entry point onto the A20 directly behind the railway bridge, as there are already several roads joining the A20 on both sides: <ul style="list-style-type: none"> - Church Street north and south, - West Street/ East Street - Fairbourne Lane - Hook Lane - plus 3 access points to and from small scale developments.
(29) Tanyard Farm, Old Ashford Road, Lenham	<p>CPRE Protect Kent objects the allocation of this site because it comprises an unacceptable expansion of Lenham and comprises 'urban sprawl'.</p>
(30) Glebe Gardens, Lenham	<p>Subject to ecological assessment and flood risk assesment, CPRE Protect Kent does not object to the suggested dwellings and housing density. However, we would like Glebe Pond to be safeguarded as an accessible open space. Glebe Pond is the visible source of the river Len and as such of high landscape value for the Maidstone Borough. It is also important in respect of Lenham's history and identity as it is regarded as the village pond.</p>

<p>(31) Ham Lane, Lenham</p>	<p>CPRE Protect Kent objects to this allocation for the following reasons:</p> <ul style="list-style-type: none"> • Ham Lane serves Lenham Storage, which makes any access from a side road dangerous. Significant numbers of lorries turn in and out of Ham Lane from and onto the A20. We do not consider it safe to have a residential area accessed so closely to the junction with the A20. In order to assess the situation properly, Lenham Storage could provide numbers of articulated lorries which enter or leave the site on a daily basis. There is also, especially at peak times, considerable traffic from cars which enter and leave the residential areas on that side of Lenham. • Ham Lane marks the Lenham village boundary to the west. By extending the residential area beyond Ham Lane, there is no clear border with Harrietsham and thus constitutes a de facto merging of Harrietsham and Lenham. • The improvements to pedestrian and cycle links to Lenham village centre could, in our opinion, only be achieved by narrowing the road to accommodate a pavement and cycle lane. We have doubts that Ham Lane is wide enough to allow such an alteration. • In order to protect the setting of the Kent Downs AONB, the site ought to be screened along the A20 with additional tree planting.
<p>(32) Howland Road, Marden</p>	<p>CPRE Protect Kent objects to this site as proposed, but we consider that a smaller development of no more than 10 dwellings could be acceptable.</p>
<p>(33) Stanley Farm, Plain Road, Marden</p>	<p>CPRE Protect Kent objects strongly to this site as it is a totally inappropriate very large extension of the village to the southeast. Together with the Parsonage (site 34), it would form one huge estate.</p> <p>We believe that Marden will be overwhelmed by the sheer numbers of houses being proposed at this site and others contrary to:</p> <ul style="list-style-type: none"> • key local issues – item 2; • spatial objectives – item 4; • Policy SS1 - item 5; and • Paragraph 6.13/Policy H2 of the Plan.

	<p>We believe that the Council should recognise the adverse effects that these numbers will have and should respect the interests of the current population.</p>
(34) The Parsonage, Goudhurst Road, Marden	<p>This site already has planning permission, although totally improper extension in to agricultural backland.</p>
(35) Marden Cricket and Hockey Club, Stanley Road, Marden	<p>CPRE Protect Kent objects strongly to this site. It is an overly large extension to the south of the village and is close to Stanley Farm.</p> <p>We believe that Marden will be overwhelmed by the sheer numbers of houses being proposed at this site and others contrary to:</p> <ul style="list-style-type: none"> • key local issues – item 2; • spatial objectives – item 4; • Policy SS1 - item 5; and • Paragraph 6.13/Policy H2 of the Plan. <p>We believe that the Council should recognise the adverse effects that these numbers will have and should respect the interests of the current population.</p>
(36) Hen and Duckhurst Farm, Marden Road, Staplehurst	<p>CPRE Protect 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.</p> <p>We believe that Marden will be overwhelmed by the sheer numbers of houses being proposed at this site and site (37) contrary to:</p> <ul style="list-style-type: none"> • key local issues – item 2; • spatial objectives – item 4; • Policy SS1 - item 5; and • Paragraph 6.13/Policy H2 of the Plan. <p>We believe that the Council should recognise the adverse effects that these numbers will have and should respect the interests of the current population.</p>
(37) Fishers Farm, Fishers Road, Staplehurst	<p>CPRE Protect 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.</p> <p>We believe that Marden will be overwhelmed by the sheer numbers of houses being proposed at this site and site (36) contrary to:</p> <ul style="list-style-type: none"> • key local issues – item 2; • spatial objectives – item 4; • Policy SS1 - item 5; and

	<ul style="list-style-type: none"> • Paragraph 6.13/Policy H2 of the Plan. <p>We believe that the Council should recognise the adverse effects that these numbers will have and should respect the interests of the current population.</p>
(38) Old School Nursery, Station Road, Headcorn	CPRE Protect Kent supports the allocation of this site, which is within the already built area of the village.
(39) Ulcombe Road and Mill Bank, Headcorn	<p>CPRE Protect Kent objects to this allocation as:</p> <ul style="list-style-type: none"> • It comprises a major extension to the northern side of the village into an area designated as a Special Landscape Area; • It is classified as agricultural land; • It is on the edge of a flood prone area; and • There is insufficient infrastructure in place including sewers and road infrastructure.
(40) Grigg Lane and Lenham Road, Headcorn	<p>CPRE Protect Kent objects to this allocation as:</p> <ul style="list-style-type: none"> • It will extend the village into green agricultural countryside; • It is covered by special landscape area classification; • It is outside the village envelope; • There is insufficient infrastructure in place i.e. sewers and roads; and • It is on the edge of flood prone area.
(41) South of Grigg Lane, Headcorn	<p>CPRE Protect Kent objects to this allocation as:</p> <ul style="list-style-type: none"> • The whole of site is covered by a special landscape classification, with green countryside to south east; • There is insufficient infrastructure in place; and • It is on the edge of a flood prone area with the river Sherway to the east.
(42) Knaves Acre, Headcorn	CPRE Protect Kent supports this allocation.
(43) Linden Farm, Stockett Lane, Coxheath	<p>CPRE Protect Kent objects to this allocation as:</p> <ul style="list-style-type: none"> • 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 • it will lead to increased congestion in the centre of the village.

<p>(44) Heathfield, Heath Road, Coxheath</p>	<p>CPRE Protect Kent objects very strongly to this allocation as:</p> <ul style="list-style-type: none"> • it is prime agricultural land in open countryside; • it will narrow the green open countryside between Coxheath and Loose A229 road; • the proposed access to the site is from B2163 which at the present is not a safe or satisfactory road to travel along because of the 'Road Build Outs' to slow down the traffic; • It is not in the Coxheath Neighbourhood Plan; • It will be close to the large park and ride proposed at the Linton cross roads on prime agricultural land at the A229/B2163 junction.
<p>(45) Forstal Lane, Coxheath</p>	<p>CPRE Protect Kent objects very strongly to this allocation as:</p> <ul style="list-style-type: none"> • it unacceptably extends the north east side of Coxheath; • it is connected to the Heathfield, Heath road proposal on prime agricultural land; • it will narrow the strip of green, open countryside between Coxheath and Loose A229; • It is not in the Coxheath Neighbourhood Plan; and • 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.
<p>(46) Vicarage Road, Yalding</p>	<p>CPRE Protect Kent object to this allocation as:</p> <ul style="list-style-type: none"> • access is proposed from Vicarage Road, which is unsuitable; • the site comprises agricultural land in open countryside on the edge of Yalding conservation area; • it is in a flood prone area; • further thought needs to be given to community infrastructure of the village for the future low cost and social housing; • flood defence infrastructure for the village is yet to evolve; and.

	<ul style="list-style-type: none"> • There is no spare infrastructure capacity i.e. roads, sewers, water, electricity and gas.
(47) Hubbards Lane and Haste Hill Road, Boughton Monchelsea	CPRE Protect 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.
(48) Heath Road, Boughton Monchelsea	<p>CPRE Protect Kent objects to this allocation as:</p> <ul style="list-style-type: none"> • It comprises prime agricultural land which should be retained; • The development is sandwiched between back land on either street; • Church street is not a suitable access for this development; and. • More community infrastructure will need to be put in place.
(49) East of Eyhorne Street, Eyhorne Street (Hollingbourne)	CPRE Protect Kent accepts this allocation provided the trees on the site are retained.
(50) West of Eyhorne Street, Eyhorne Street (Hollingbourne)	CPRE Protect Kent objects to this allocation but consider that some development confined to the road frontage might be acceptable if supported by the local community.

Para 6.13	CPRE Protect Kent welcome and support the first sentence of this paragraph. As we have explained elsewhere in our response, this is a point that should also be included within the spatial strategy part of the Plan (Chapter 4).
Policy H2	<p>CPRE Protect 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:</p> <ol style="list-style-type: none"> 1. 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. 2. With regard to points 2 and 3, we agree with the densities suggested, but in both we would suggest that the words “<i>at least</i>” are inserted before the density figure. 3. In point 2 the words “<i>At sites adjacent to</i>” are replaced by “<i>In</i>”. It is inappropriate to suggest that other (presumably unallocated) sites outside of the defined urban area may be considered for development,

	<p>given that all allocated sites will be included within the urban area.</p> <p>4. For the same reason, the words “<i>or adjacent to</i>” should be deleted from point 3.</p> <p>5. In the final paragraph, the words “<i>other settlements</i>” should be replaced by “<i>the villages</i>” and again the words “<i>at least</i>” 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.</p>
<p>Policy H3</p>	<p>CPRE Protect 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.</p> <p>On the specific proposed locations we would comment as follows:</p> <p><u>Maidstone Town Centre</u>: The contribution from this location seems to come entirely from poorer quality offices, and given the statements made in paragraph 6.15 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.</p> <p><u>Invicta Park Barracks</u>: Whilst we acknowledge 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.</p> <p><u>Lenham</u>: CPRE Protect Kent object 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.</p> <p>The Plan already proposes sites for allocation at Lenham for a total of 245 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.</p> <p>Such a significant scale of development would be disproportionate to Lenham’s position in the settlement hierarchy, compared with the level of</p>

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.

As acknowledged in paragraph 6.20 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

	<p>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?</p> <ul style="list-style-type: none"> • 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.
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Chapter 7 – Retail and mixed use allocations

Policy RMX1 – Retail and mixed use allocations	
Newnham Park	CPRE Protect 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 concerns about retail development in this location, which we consider fail the sequential test required by the NPPF and as a consequence will undermine the town centre.
Maidstone East and Royal Mail sorting office	CPRE Protect 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.
King Street car park/AMF Bowling	CPRE Protect Kent accepts this allocation.
Clockhouse Farm, Heath Road, Coxheath	CPRE Protect Kent considers that this site has potential for some development, but the current proposals seem excessive.
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.

Chapter 8 – Employment allocations

Policy EMP1 – Employment allocations	
(1) Mote Road, Maidstone	CPRE Protect Kent objects to this allocation as the site should be retained for car parking.
(2) South of Claygate, Pattenden Lane, Marden	CPRE Protect Kent accepts the logic of allocating this site given the development to the north.
(3) West of Wheelbarrow Industrial Estate, Pattenden Lane, Marden	CPRE Protect Kent objects to the allocation of this site as it will over extend the existing rural area.
(4) West of Barradale Farm, Maidstone Road, Headcorn	CPRE Protect Kent objects strongly to this allocation as it comprises inappropriate development in the open countryside.

Chapter 9 – Gypsy and Traveller allocations

Policy GT1	Given our comments on the need for pitches (see comments on paras 4.9 – 4.11) we do not feel able to comment on specific sites in advance of a new GTTSAA being undertaken in the allocations.
------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Chapter 10 – Park and ride allocations

Policy PKR1	<p>CPRE Protect Kent objects to the allocation of a new park and ride site at the A229/B2163 Linton crossroads for the following reasons:</p> <p>Absence of Integrated Transport Strategy The Local Plan has to meet two major challenges. The first is to accept the “objectively assessed” requirement to allow the construction of a total of 19,600 dwellings by 2031. The second is to deal with the serious and undoubted traffic problem of Urban Maidstone, to which the provision of all these dwellings would add. That problem is intended to be addressed by an Integrated Transport Strategy (ITS). Indeed, the Plan’s Spatial Vision 2 says, somewhat inconsequentially, that <i>“Development will be guided by the delivery of the Integrated Transport Strategy...”</i>. The trouble is that, at the time of writing, there is no ITS. An ITS 2012-2026 was prepared and issued for public consultation in August 2012 but it was based on a target of 10,080 new dwellings within that period which has been replaced by 19,600 to 2031. Accordingly that ITS was withdrawn, is now subject to re-modelling and refining and a new one is due for public consultation in Summer 2014 – long after the closing date for the Local Plan consultation on 7 May 2014.</p> <p>Local Plan’s Substitute for ITS on Park & Ride and J7 However, that has not prevented the Local Plan from anticipating, with some imprecision, some of the Strategy in Policy DM13 (Sustainable Transport), DM14 (Public Transport), DM15 (Park & Ride) and Policy PKR1 (Park & Ride Allocation). Under Policy PKR1 (2) the existing P & R site at Old Sittingbourne Road, in a commercial environment near J7 of</p>
-------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

the M20, would be encouraged to expand from 600 spaces to 1,000 spaces by adding a new deck.

Proposal for P & R at Linton Cross Roads

Under Policy PKR1 (1) encouragement would be given to the creation of a new 1,000 space 6.8 gross (ha) P & R site at Linton Cross Roads on agricultural land in what is currently a Special Landscape Area, bounded by houses, adjacent to Greensand Ridge, a Conservation Area, opposite the listed Linton Park and parkland, also a candidate since 2010 awaiting MBC technical inclusion in the Conservation Area.

It is said that modelling in progress to accommodate the additional traffic strains caused by the new housing target of 19,600, envisions a north/south P & R Spine, with the Old Sittingbourne Road P & R as north and a new Linton Cross Roads P & R as the most viable option for the south. In passing it should be remembered that, in addition to the existing heavy and accident-prone traffic at Linton Cross Roads, more traffic must be expected from and to the 1,905 housing allocations at Marden, Staplehurst and Coxheath and the new employment allocations of 21,300m2 at Marden.

PKR1 para 10.3 claims that landscape mitigation is key to the delivery of Linton Cross Roads as a P & R site. Nothing, however, can disguise a 1,000 space site, with ancillary buildings and lighting. Nothing can disguise the visible, audible and environmental traffic flow consequences of such a scheme involving the heavily used A229 and the mere B road 2163.

Lack of Evidence

Far from landscape mitigation being the key to make this site successful, the proposal seems oblivious to other fundamental matters which are required to make the case at all. No evidence has been produced of origin and destination of traffic passing through the Cross Roads, or its volume, or of the type of vehicles, or their timing. No evidence has been produced to support the claim in PKR1 para 10.1 that a P & R site *“can help to accommodate journeys from new housing and employment developments in the Borough”*, whatever that may be intended to involve. On the contrary, paras 11.66-11.69 record a history of declining use of and significant annual subsidy of approximately £400,000, for the current three P & R sites. No evidence is given of the bus priority measures to be provided from Linton, nor recognition that this cannot work on the single track from south of Loose bridge to Wheatsheaf junction. No evidence is offered on the cost, financing, ownership and cost benefit of the Linton P & R site nor, ominously, on its planning future if financially unviable, as appears to have been the case at Armstrong Road.

Conclusion

CPRE Protect Kent is firmly opposed to the destruction of protected and sensitive countryside unless there is overwhelming evidence to support it. At the moment, there is none in this case. Nevertheless, we must reserve our right to review our conclusion in this instance - and the

	<p>broader Local Plan - when a final Integrated Transport Strategy is published for public consultation in Summer 2014. We remain very conscious of the need to relieve, so far as may be realistic, the traffic problem with which the town continues increasingly to be burdened.</p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Chapter 11- Development management policies for Maidstone Borough

<p>Policy DM1</p>	<p>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. Consequently an additional criterion is needed to provide locational guidance. We would suggest a criterion along the following lines:</p> <p><i>“The site is located within a defined settlement boundary or is otherwise sustainably located in regard to the highway network and public transport services and would accord with Policy SP5.”</i></p>
<p>Policy DM2</p>	<p>CPRE Protect Kent supports this Policy.</p>
<p>Policy DM3</p>	<p>CPRE Protect Kent generally support this Policy, but we suggest that it be re-worded as follows:</p> <p><i>“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.</i></p> <p><i>Elsewhere, proposals will be permitted provided there is no unacceptable impact on:</i></p> <ol style="list-style-type: none"> <i>1. the landscape;</i> <i>2. heritage assets and their setting;</i> <i>3. the amenities of local residents;</i> <i>4. the local transport network; and</i> <i>5. ecology and biodiversity, including the identification of measures to mitigate impact and provide ecological or biodiversity enhancement.</i> <p><i>In the case of wind turbines, [in addition to 1 to 5 above] consideration will be given to the impact on:</i></p> <ol style="list-style-type: none"> <i>i. Air traffic and safety;</i> <i>ii. Defence installations and operations;</i> <i>iii. Other radar installations; and</i> <i>iv. Electromagnetic transmissions.</i> <p><i>In all cases, regard will be given to the cumulative impact of such proposals in the local area.”</i></p>
<p>Policy DM4</p>	<p>CPRE Protect Kent supports this Policy, but criterion iii should be deleted as it seems to be already included within criterion ii.</p>

Policy DM5	CPRE Protect Kent supports this Policy.
Policy DM6	CPRE Protect Kent supports this Policy, but would like to see the following added to the end of the second sentence of para 11.20: <i>“as well as the tranquillity of the countryside.”</i>
Policy DM7	CPRE Protect Kent supports this Policy.
Policy DM8	CPRE Protect Kent supports this Policy.
Policy DM9	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 DM10	CPRE Protect Kent supports this Policy, but: <ul style="list-style-type: none"> • In <u>point 1i</u> it is unclear what is meant by <i>“protect positive historic and landscape...”</i>. Why is the word ‘positive’ included? • In <u>point 2</u> add <i>“, tranquillity”</i> after <i>“diversity”</i>.
Policy DM11	CPRE Protect Kent supports this Policy.
Policy DM12	CPRE Protect Kent supports this Policy.
Policy DM13	CPRE Protect 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 4 or 5 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 DM14	CPRE Protect 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 4 or 5 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 DM15	This Policy is unnecessary and should be deleted. Why is it necessary to define park and ride sites when other existing land uses are not so defined? If it is necessary, to what end – the Policy simply identifies them? Are there likely to be any other new park and ride sites in addition to the proposals in Policy PKR1?
Policy DM16	In an effort to word this Policy in a positive way the Policy has become tortuous. For some issues it is appropriate to express the policy in a negative fashion, i.e. that planning permission will not be permitted, and this is one such policy. In the interests of clarity, therefore, the Policy should be redrafted to set out the circumstances where development will not be acceptable because of impact on air quality.
Policy DM17	CPRE Protect 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 DM18	CPRE Protect Kent supports this Policy.
Policy DM19	CPRE Protect Kent supports this Policy.
Policy DM20	CPRE Protect Kent supports this Policy, but point 4 should also include community uses in the same way that points 1 and 2 do.
Policy DM21	CPRE Protect 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 DM22	CPRE Protect Kent supports this Policy.
Policy DM23	CPRE Protect Kent fails to see in what way 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 DM24	CPRE Protect Kent accepts that it is appropriate to seek varying levels of affordable housing depending on location. However, we consider that seeking just 15% on previously developed sites in the urban area is too low.
Policy DM25	<p>CPRE Protect Kent generally supports this Policy, but considers that its construction could be improved by following that used for Policy DM26. We would suggest, therefore that it be recast as follows:</p> <p><i>“Planning permission will be granted for local needs housing as an exception to usual policies of restraint designed to protect the countryside from development provided:</i></p> <ol style="list-style-type: none"> <i>1. A need for it has been identified by a local needs housing survey undertaken by or on behalf of the Parish Council concerned;</i> <i>2. The housing provided will be occupied by those identified in need for housing in the Parish Council area;</i> <i>3. The housing provided will remain available in perpetuity to meet the local need for which it was permitted. This will be secured by planning conditions and/or legal agreements as appropriate;</i> <i>4. The site is sustainably located in regard to proximity to local services, in particular school and health facilities, and that these are accessible preferably on foot, by cycle or on public transport;</i> <i>5. The development would not harm the landscape and rural character of the area, in particular the Kent Downs Area of Outstanding Natural Beauty, and the openness of the Metropolitan Green Belt. Appropriate landscaping will be provided where necessary to mitigate impact;</i> <i>6. The scale of the development is appropriate to the context of the settlement where it is located;</i> <i>7. The site can be safely accessed to and from the highway by all vehicles using the site on a regular basis;</i> <i>8. The site is not located in an area at risk from flooding (zones 3a and 3b) based on the latest information from the Environment Agency or a specific</i>

	<p><i>Flood Risk Assessment which has been agreed by the Environment Agency; and</i></p> <p>9. <i>The ecological impact of the development has been assessed through appropriate survey and a scheme for any necessary mitigation and enhancement measures confirmed.</i></p>
Policy DM26	CPRE Protect Kent supports this Policy.

Chapter 12 - Development management policies for the town centre

Policy DM27	CPRE Protect Kent supports this Policy.
Policy DM28	CPRE Protect Kent supports this Policy, but we consider that it should also allow residential development as well.
Policy DM29	CPRE Protect Kent supports this Policy.

Chapter 13 - Development management policies for the countryside

Policy DM30	<p>CPRE Protect Kent support this Policy subject to the opening paragraph being amended to read as follows:</p> <p><i>“Development in the countryside which is acceptable under Policy SP5 should be of a high quality of design and meet the following criteria:”</i></p>
Policy DM31	CPRE Protect Kent supports this Policy.
Policy DM32	<p>CPRE Protect Kent would wish to see the Policy redrafted as follows:</p> <p><i>“Outside of the settlement boundaries as defined on the policies map, proposals for the re-use and adaptation of existing rural buildings for commercial, industrial, sport, recreation or tourism uses which meet the following criteria will be permitted:</i></p> <ol style="list-style-type: none"> <i>1. The building is of a form, bulk and general design which is in keeping with its rural surroundings;</i> <i>2. The building is of permanent, substantial and sound construction and is capable of conversion without major or complete reconstruction;</i> <i>3. Any alterations proposed as part of the conversion are in keeping with the rural character of the building in terms of detailed design, form and materials;</i> <i>4. There is sufficient room in the curtilage of the building to provide appropriate car parking for the use without detriment to the visual amenity of the countryside;</i> <i>5. No fences, walls or other structures associated with the use of the building or the definition of its curtilage or any sub-division of it are erected which would harm the visual amenity of the countryside;</i> <i>6. The traffic generated by the new use would not result in the erosion of roadside verges, and is not detrimental to the character of the countryside;</i> <i>7. In the case of a tourist use, the amenity of future users would not be harmed by the proximity of farm uses or buildings; and</i> <i>8. In the case of self-catering accommodation a holiday occupancy</i>

	<p><i>condition will be attached, preventing their use as a sole or main residence.</i></p> <p><i>Proposals for the re-use and adaptation of existing rural buildings for residential purposes will not be permitted unless the following additional criteria to the above are met:</i></p> <p><i>9. Every reasonable attempt has been made to secure a suitable business re-use for the building;</i></p> <p><i>10. Residential conversion is the only means of providing a suitable re-use for a listed building, an unlisted building of quality and traditional construction which is grouped with one or more listed buildings in such a way as to contribute towards the setting of the listed building(s), or other buildings which contribute towards the character of the countryside or which exemplify the historical development of the Kentish countryside; and</i></p> <p><i>11. There is sufficient land around the building to provide a reasonable level of outdoor space for the occupants, and the outdoor space provided is in harmony with the character of its setting.”</i></p>
Policy DM33	CPRE Protect Kent supports this Policy.
Policy DM34	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 SP5.
Policy DM35	CPRE Protect Kent supports this Policy.
Policy DM36	CPRE Protect Kent supports this Policy but would suggest that it could be shortened by making in point 2 a cross reference to Policy DM32 in regard to those criteria that are common to both policies.
Policy DM37	CPRE Protect Kent would wish to see additional criteria in regard to: <ul style="list-style-type: none"> • No adverse impact on landscape character; and • Restricting lighting
Policy DM38	CPRE Protect Kent would wish to see additional criteria in regard to: <ul style="list-style-type: none"> • Development in the AONB being unacceptable; • Outside the AONB, no adverse impact on landscape character; • Restricting lighting
Policy DM39	CPRE Protect 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 DM40	CPRE Protect Kent supports this Policy but: <ul style="list-style-type: none"> • It needs to include a criterion that any such retail outlets will only be acceptable where they are use an existing building in the farm holding; and • A definition of a ‘<i>significant proportion</i>’ in point 1i is provided.

Policy DM41	CPRE Protect Kent supports this Policy but it should include an additional criterion that addresses the issue of cumulative impact of equestrian related development.
-------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------

Chapter 14 – Delivery framework

Policy ID1	CPRE Protect 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.
Policy ID2	CPRE Protect Kent supports this Policy but we would wish to see point 2 redrafted as follows: <i>“equipment is sited so as to minimise impact on the natural and historic environment;”</i>