

**MAIDSTONE LOCAL PLAN REVIEW**  
**SCOPING THEMES AND ISSUES CONSULTATION**  
**July to 30<sup>th</sup> September 2019**  
**Marden Parish Council response (Word document)**  
**FINAL RESPONSE**

**OVERARCHING QUESTIONS:**

OO1 – What can the Local Plan Review do to make the growth we need “good growth”?

Educating elected members so that planning policy and planning decisions are taken for the benefit of the whole borough.

Emphasis on the benefits of development - not automatic objection.

Ensure infrastructure in place prior to development commencing and S106/CIL is used to make ‘good growth’. Trigger points for S106 monies should be brought forward

OO2 – What could the Local Plan Review do to help make our town and village centres fit for the future?

Essential to retain and enhance existing services and community facilities.

Flexible approach to encourage new services and community facilities eg policies to allow for such facilities beyond the village envelope

Ensure infrastructure is in place before development commences and listen to local communities about what infrastructure is needed both before development commences and post development. E.g. where S106 monies have already been collected and allocated they should be spent before further development is brought forward.

OO3 – How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?

Greater liaison with Parish Councils in drafting S106 agreements.

Welcome the introduction of CiL which would potentially allow for implementation in advance of development unlike S106 and trigger points. Where S106 applies trigger points must be actively enforced.

Take notice of Parish Councils Infrastructure Spend Plans and the priorities applied to each item.

Ensure essential infrastructure is in place prior to development e.g. Schools, health centres, parking at train stations eg in Marden infrastructure improvements have not taken place prior to developments commencing and indeed S106 monies are not being spent by relevant authorities to provide infrastructure improvements.

OQ4 – What overall benefits would you want to see as a result of growth?

The needs of all the community taken into account particularly young people who may not previously have lived in a village community.

The provision of dedicated youth facilities and youth workers is essential.

Provision of sustainable local employment.

As well as improvements in all forms of infrastructure, additional community facilities, open space, woodland and truly affordable housing

OQ5 – What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?

Dedicated youth facilities and youth workers. It is not satisfactory that developers just stick a children's playground in open space, teenagers need to be catered for.

Adequate car parking for village services including train stations.

Adequate public transport e.g. there is no evening/Sunday bus service from Marden to surrounding villages and Maidstone.

Retention and creation of more areas to walk, cycle, horse ride (including bridle ways) safely.

Marden Draft Neighbourhood Plan Policy A1 - Community Facilities states: "Development proposals that help to sustain the existing community facilities and create new facilities either directly through developer contributions or indirectly by encouraging local spending will be supported provided development conforms with other policies in the plan. Any new development should prioritise dedicated youth facilities."

Marden Draft Neighbourhood Plan Policy A2 - Open Space states: "All major development should provide areas of amenity, recreation, woodland, ponds or other water features and these to be retained for community use. Links should be provided between areas of open space, community facilities and the public rights of way network, with management plans confirming operating responsibilities put in place to safeguard the future retention of these areas."

QQ6 – How can the Local Plan Review help support a thriving local economy, including the rural economy?

Greater flexibility in planning policy to accommodate the changes in commercial/business spheres. Eg Pattenden Lane - may no longer be appropriate to limit to B1, B2 and B8 only.

There needs to be more opportunity for greater diversification.

Emphasis on good telecommunications provision e.g. fast broadband and access to 4G (and 5G).

Improved transport links so that those who travel to Marden for employment can access the village more easily - road, rail, bus.

Train station access to Pattenden Lane from downside platform.

Encourage businesses to employ local people.

Ensure there is provision for adequate car parking, especially for people travelling by car to train stations - recognise that those people often travel from outside the immediate area e.g. many commuters travelling from Maidstone, Goudhurst and surrounding settlements to Marden Station

Marden Draft Neighbourhood Plan Policy E1 - Business and Employment states: "Support will be given to employment-generating businesses that maximise employment opportunities within the parish. Support will be given to development which provides opportunities for start-up ventures and contributes to the growing reputation of the parish as a location for innovative commercial uses and those with a local connection or using local produce. The development should have a suitable road access to and from primary routes such as the A229 and should not result in any unacceptable impact on residential amenity or the character of the surrounding area and wider countryside. The development should be suitably landscaped to reflect Marden's rural setting."

QQ7 – How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough that takes a pro-active approach to climate change?

Improvements to rural public transport.

Positive approach to applications for renewables.

Provision of car parking.

Do not cut down trees and ensure many more trees are planted.

More emphasis on recycling.

Marden Draft Neighbourhood Plan Sustainable Construction section states: "The Marden Neighbourhood Plan recognises and fully supports developments which show high levels of sustainability. Residents are only too aware of surface water management and quality issues in the parish - see policies NE1 and NE2. Similarly, the installation of small-scale renewable energy schemes at both domestic and commercial level is encouraged. There are an increasing number of local examples of good practice. New buildings can also incorporate simple measures to

encourage wildlife habitats. This includes the provision of bat and nest boxes and bee bricks for example." "The use of rainwater harvesting is recommended for all new development. The use of solar thermal technology, ground and air source heat pumps and heat recovery systems are encouraged, with the ultimate aim of achieving minimal energy use through the use of passive house design."

Marden Draft Neighbourhood Plan Policy BE3 - Sustainable Construction states: "All development must be based upon the principles of sustainable construction and accord with the most up-to-date guidance and best practice. Support will be given to development that provides or incorporates low or zero carbon technologies providing development conforms with other policies in the plan."

Marden Draft Neighbourhood Plan Policy NE1 - Surface Water Management states: "Support will be given to development proposals that include appropriate sustainable surface water control systems designed to deliver efficient, clean water handling as well as wildlife and amenity benefits. Schemes must be accompanied by a detailed management plan confirming operating responsibilities to ensure the permanent management and maintenance of all elements of the schemes to maximise local benefits."

Marden Draft Neighbourhood Plan Policy NE2 - Water Quality states: "Development proposals that seek to protect the water quality downstream by strict controls on the potential release of contaminants, both during construction and in use will be supported. Sustainable drainage networks should be designed for ease of long term maintenance, as well as lifetime efficiency. Best sustainable on-site use should be made of materials arising from maintenance."

Marden Draft Neighbourhood Plan Policy NE3 - Landscape Integration states: "All proposed developments should be designed to integrate into their surroundings in the landscape and contribute positively to the conservation and enhancement of that landscape. Dense hedgerow planting with native species is the preferred boundary treatment if the strengthening of existing hedgerows or restoration of lost hedgerow boundaries is not possible. Artificial lighting systems, if deemed necessary, require sensitive treatment to reduce visual intrusion and negative impacts on wildlife."

Marden Draft Neighbourhood Plan Policy NE4 - Biodiversity and Habitats states: "Owing to the unique setting of Marden in its surrounding landscape all new development is expected to support actively the aims of the Kent Biodiversity Strategy, to protect Priority Habitats and, where possible, contribution to the Biodiversity Opportunity Areas. A biodiversity net gain philosophy should be implemented so that any habitat or species loss is replaced elsewhere on-site, in excess of the amount originally lost. Local off-site re-creation is viewed as a last resort but the net gain principle would apply to ensure there is a positive impact from the new works."

Marden Draft Neighbourhood Plan Policy NE5 - Landscape Planting states: "New landscape planting in Marden must be selected from native species of local provenance for visual continuity and to maintain the natural rhythms of the vegetation in the surrounding area. Priority should be given to species that provide food and shelter to wildlife. Adequate space must be allocated on the Site Plan to allow the planting to reach maturity without detriment to the amenity of the development such as encroaching on neighbouring property, excessive shading of gardens or interruption of external views."

Marden Draft Neighbourhood Plan Policy NE6 - Soil Conservation states: "Development proposals should demonstrate sustainable on-site soil management and minimise the import of subsoil and

topsoil and the export of an excavated grounds materials."

OQ8 – Are there any other themes, issues and choices that you believe we should address as part of this Local Plan Review?

Emphasis on providing suitable facilities for young people, especially in the rural areas.

Emphasis on green energy.

Incentivising use of brown field sites through a sliding scale of CIL contributions.

**TECHNICAL QUESTIONS:**

TQ1 – What do you think should be the end date for the Local Plan Review? Why?

Longest view possible on strategic aims with regular local plan policy reviews to help keep abreast of changing working patterns, technology advances, housing demands.

Allocated land for employment, housing, services, infrastructure, cemeteries etc - not just the minimum required.

Some ambitious long term plans.

TQ2 – Have we identified the correct cross boundary issues? Please give reasons for your answers.

Yes - Transport infrastructure vital eg avoid the problems that have arisen between MBC and TMBC where MBC members refused to allow funding to improve the Quarry Wood junction because it is in TMBC.

MBC needs to be mindful in Local Plan documentation that there are 3 mainline train lines in the Borough. The Ashford to Charing Cross/Cannon Street line serves 3 of the Rural Service Centres (Marden, Staplehurst, Headcorn) this has been omitted from p18. As well as the Paddock Wood to Strood line. The Hastings to Charing Cross line does not touch the Borough.

It should be noted that Marden station is used by commuters from Tunbridge Wells Borough (Goudhurst and surrounding settlements)

TQ3 – How do you think the council can achieve a consistent annual rate of housebuilding throughout the Local Plan Review period?

By allocating sufficient numbers of sites over and above what is needed - to take a long term view.

Housing numbers should be regularly reviewed to take into account population statistics.

TQ4 – Have we identified all the possible types of housing sites?

Limited expansion of smaller settlements. This will promote their revival and attract better

quality infrastructure particularly in terms of public transport and foul drainage.

Review sites set aside for employment that have not been taken up to see if they could be suitable for residential.

Refer to Marden Draft Neighbourhood Plan Policies In5 Affordable Housing, In6 Housing for Older People, In7 Housing for Gypsies and Travellers.

TQ5 – What approaches could we use to identify more small sites suitable for allocation in the Local Plan Review?

An MBC review with assistance from the Parish Councils to identify sites.

A more proactive approach from MBC.

Identify sites that have been set aside for employment use but which have not been taken up to see if they are suitable for residential.

TQ6 – What approaches could we use to increase the number of new homes being built on brownfield sites and to make brownfield development more viable and attractive to developers?

Through the artificial manipulation of CIL contributions but this must be based on robust and verified viability assessments.

This should not be developer led and there should be no trade-offs re affordable housing.

Increase CIL payments on greenfield sites.

TQ7 – What factors should we take into account when considering minimum density standards elsewhere in the borough, beyond the town centre?

Demand in local area for housing and the character of the site.

Provision of smaller units for affordable housing.

Consideration to be given to how the development fits into the existing settlement.

Existing infrastructure provision and impacts of development on road infrastructure e.g high density in rural areas will increase road use on country lanes built for horse and cart.

Higher density can work but in the rural areas flats of more than 2 storeys are not appropriate.

TQ8 – Have we identified all the possible types of employment sites?

At present employment sites are considered in terms of B1, B2 and B8 where proximity to transport links etc are vital. However work patterns are changing - limited traffic movements for

example.

A new class or sui generis use may be suitably located in the rural hinterland.

More flexibility is needed to reflect changing work patterns and more innovative use of employment sites is needed.

The Local Authority should be ensuring that sites designated for employment are utilised and if not then they should be reviewed for suitability for housing.

Marden Draft Neighbourhood Plan Policy E1 - Business and Employment states: "Support will be given to employment-generating businesses that maximise employment opportunities within the parish. Support will be given to development which provides opportunities for start-up ventures and contributes to the growing reputation of the parish as a location for innovative commercial uses and those with a local connection or using local produce. The development should have a suitable road access to and from primary routes such as the A229 and should not result in any unacceptable impact on residential amenity or the character of the surrounding area and wider countryside. The development should be suitably landscaped to reflect Marden's rural setting."

TQ9 – What approaches could we use to identify sites in and at the end of the town centre for future shopping and leisure needs?

The resistance to out of town retail and leisure is futile - the market and patterns of usage dictate.

Recognise that the function of town centres has changed - these should be developed as leisure destinations rather than retail.

Good infrastructure is essential - good road access, public transport, integrated transport to reduce reliance on cars and free parking.

TQ10 – Do you think there should be changes to the current settlement hierarchy? If yes, what evidence do you have for your answer?

MBC should review the criteria and evidence for RSC designation ensuring they are current, relevant and forward looking. Further research is being undertaken in Marden on this subject and will be submitted separately. This will need to be presented to Planning Policy Officers and MBC Councillors.

MBC should review the categorisations of all categories and identify which settlements should now fit in each category taking into account services available.

TQ11 – Which is your preferred option for the future pattern of growth (A, B, Bi or C) and why?

(A) – Maidstone focus: Greatly support as infrastructure is already in place; there are greater transport links; the impact on the environment would be lessened and education facilities more widely available.

(B)- If considering greater dispersal outside the urban area –Marden Parish Council recommends

using the same format as Marden has proposed in its Draft Neighbourhood Plan (Page 45: "Due to the large scale development that has been built since 2013 it is the view of Marden Neighbourhood Plan that any future development permitted until 2031 should not increase the size of the village beyond 50% of the 2011 number of dwellings, ie an additional 198 dwellings). MBC should look into fourth tier settlements in more detail and to concentrate across the whole of the borough with consideration for the smaller fifth tier settlements. MBC not to focus just on RSCs due to the already high level of development they have already absorbed.

(C) – New settlements and major extensions: Categorically no one is in favour of a major extension to existing rural settlements/villages/Rural Service Centres.

It is recommended that Category C is sub divided

C1 New settlements

C2 Major extensions

A clear distinction should be made between freestanding garden communities, urban extensions and disproportionate extensions to rural communities.

Concern that Maidstone will lose its 5-year housing supply as at the start of the Local Plan process. The process needs to be grasped at an early stage.

Fourth tier villages could include those similar in size to Yalding.

TQ12 – For your preferred option, what infrastructure would you want to see brought forward as a priority?

All options will require investment in all types of infrastructure including:

Surface/Foul Water/Drainage infrastructure

Road network

School provision

Healthcare provision

Low water pressure

Parking

Telecommunications

MBC to undertake detailed scrutiny of S106/CiL to ensure full delivery of funds to relevant agencies.

Adequate community facilities/dedicated youth facilities

Cycle routes

Electric car charging points

TQ13 – If your favoured option won't achieve the number of new homes needed, at the rate they are needed, what combination of options do you think would be best?

As TQ11

TQ14 – Have we identified the correct areas of focus for future masterplanning? What are the reasons for your answer?

MBC should undertake master planning on major sites through design briefs, in consultation with the local settlement where development is being proposed- the staff/production costs to be recouped once the development is implemented. This would improve design standards and give MBC greater control. The developer would be told what is needed not the other way around (ie Borough led not Developer led).

Page 34 of the Local Plan document states "It is also clear that plan making should set a design vision and expectation and that design policies should be developed with local communities, reflecting local aspirations. There may be a particular role for neighbourhood plans in this regard."

TQ15 – Should the national space standards be incorporated into the Local Plan Review? What the reasons for your answer?

Yes – national space standards should be incorporated. Houses should be far more adaptable for the increasing age population. Best practice of lifetime homes, Design Council guidelines, accessibility standards, sustainable construction to also be incorporated.

Compliance with Building Regulations at the planning stage M1, M2, L1A and L2A - increasing standards not just bare minimum.

Marden Draft Neighbourhood Plan Policy BE3 - Sustainable Construction states: "All development must be based upon the principles of sustainable construction and accord with the most up-to-date guidance and best practice. Support will be given to development that provides or incorporates low or zero carbon technologies providing development confirms with other policies in the plan."

TQ16 – How can the Local Plan Review best plan for the different types of housing which will be needed?

MBC need to undertake a borough-wide, thorough and robust housing needs assessment (with the emphasis on local people parish by parish) as to what type of housing is needed this would then feed into the master plan.

Emphasis should also be on housing for an aging population (multi generation houses for life. Housing for older people must not become 'granny ghettos'. Housing must be fully integrated to allow for social interaction.

Refer to Marden Draft Neighbourhood Plan Policy In5 Affordable Housing , In 6 Housing for Older People, In7 Housing for Gypsies and Travellers.

TQ17 – How can the Local Plan Review best plan for the accommodation needs of Gypsy & Travellers and Travelling Showpeople?

Allocate/identify sites in the same way as custom and self-build housing.

Co-operate with other Boroughs to provide transit sites throughout Kent.

Marden Draft Neighbourhood Plan Housing for Gypsy and Travellers section states "Marden Parish Council Planning Guidance Note for Gypsy Caravan Sites (2017) states: "Marden Parish Council appreciates the significance of the gypsy way of life in dealing with gypsy related planning issues. The Parish Council is aware of the need to balance the potential impact of a proposal against the needs and personal circumstances of the applicant. When responding as a consultee to the Local Planning Authority, usually MBC, on gypsy related applications the Parish Council will consider the following: (1) The impact of a planning application in terms of its siting and potential effect upon the residential amenity, character, landscape, agriculture, conservation and highways of the area; (2) The gypsy status of the applicant, any relevant personal factors and any proven links with Marden Parish which may render the application exceptional." "Suggested conditions: (1) Only on a temporary basis (3 years); (2) Removal on cessation of use for residential; and (3) Limited permission to named persons only.""

Marden Draft Neighbourhood Plan Policy In7 - Housing for Gypsies and Travellers states: "Support will be given to the development of small scale gypsy and traveller sites that provide adequate levels of residential amenity of the occupants and do not result in unacceptable harm to the residential amenity of the existing neighbours, the character of the countryside or the biodiversity of the wider area."

TQ18 – How can the Local Plan Review help ensure that local economic growth benefits everyone?

Address rural poverty.

Increased public transport will allow access to retail services further afield.

If Option A or B was taken up this would enhance the distribution of benefit.

If Option C is used this would focus all the benefits, including local economic growth benefits in one area and fail to ensure that local economic growth benefits everyone.

Increase business rates.

Increase CIL.

Investment in Maidstone does not necessarily benefit Marden as the public transport links are poor.

TQ19 – How can the Local Plan Review help sustain our town and local centres?

Consider conversion to housing of town centre buildings.

Rather than sustain retail functions within the town centre it should take on more housing and use out of town retail centres - greater flexibility to allow for a leisure destination rather than a retail function.

MBC to consider developing the upper stories of businesses into residential within the town centre.

The importance of living in the town centre giving easier accessibility to leisure and employment and offers more security (refer to Option A).

Having an integrated transport system (ie dedicated road system for buses into the town centre).

Recognise the changing function these centres perform.

Marden Draft Neighbourhood Plan Retail, Eat; Meet and Greet section states: "The plan recognises that shopping habits are changing rapidly. Therefore the retailers seeking to locate in Marden are likely to be service providers. This may also generate the need for shops and services to locate outside the recognised district centres. The plan seeks to be sufficiently flexible to accommodate future market trends."

Marden Draft Neighbourhood Plan Policy E2 - Retail, Eat; Meet and Greet states: "Support will be given to the creation, retention and enhancement of shops and other uses that service the community of Marden."

TQ20 – How can the Local Plan Review best plan for the new infrastructure that will be needed to support growth?

MBC need to recognise that people commute outside the borough when planning sites/locations for future developments. E.g. Not all residents of Marden travel to Maidstone to work – a lot of people commute out of the borough for employment (Paddock Wood, Tunbridge Wells, Kings Hill) and use small country roads to access these destinations (ie travelling West or East). Better transport links between all employment areas.

Proper robust/realistic travel and transport modelling for RSCs/larger settlements and larger villages based on current population.

Forge better links with MBC/KCC

By ambitious forward thinking improvements and new infrastructure. Designed and costed improvements (in liaison with provider eg. KCC (Highways and Transportation) - design etc costs could be recouped through CIL/S106.

Marden Draft Neighbourhood Plan Policy In1 - Water Supply/Water Supply and Sewerage states: "New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the plan."

TQ21 – Have we identified all the types of transport measures? Which measures do you think we should prioritise?

Rural bus services.

Additional parking for commuters at train stations.

Marden Draft Neighbourhood Plan Policy In2 - Sustainable Travel states: "Support will be given to developments designed to maximise travel on foot and by cycle and that provide direct links to village facilities and public transport services via off-road and lightly trafficked routes, or through improvements for non-motorised users on busier existing routes. Developments should not hinder existing walking and cycling routes unless a convenient alternative route is provided. Major sites should be designed to provide through routes for pedestrians and cyclists where this would help improve non-vehicular access from adjacent housing or business premises and to facilitate links with any nearby public rights of way or open space."

Marden Draft Neighbourhood Plan Policy In3 - Additional Traffic states: "Developments generating additional traffic should be located only where: (a) direct access to suitable roads is either already available or will be provided before the use commences; or (b) mitigation measures are provided to reduce traffic impacts on otherwise less suitable roads to an acceptable level."

Marden Draft Neighbourhood Plan Policy In4 - Station states: "Support will be given to proposals to enhance facilities at Marden Station including any development required to meet increased demand providing the proposal accords with other policies in the plan."

Marden Draft Neighbourhood Plan Transport section Further Actions states: "(1) Station infrastructure stakeholders (including Network Rail, train operating company, Department for Transport, KCC and Marden Parish Council) to pursue enhancement opportunities including additional station parking and step-free access to the 'down' platform; and (2) Bus infrastructure stakeholders (including bus operating companies, KCC, MBC and Marden Parish Council) to pursue enhancement opportunities including additional bus services, new or replacement bus stop signage, road markings and bus shelters."

TQ22 – How can the Local Plan Review best integrate health and wellbeing in the planning of new development?

Through the highest quality design.

Adequate garden space provision.

Cradle to grave housing.

Fully adaptable for all ages.

All services within walking distance/safe pedestrian links.

Highest level of accessibility on all aspects.

Landscaping / Green and Blue Infrastructure.

Marden Draft Neighbourhood Plan Policy BE2 - Residential Amenity states: "New housing development and residential extensions and alterations should provide suitable residential amenity for residents, both existing and future, in terms of privacy, light and outlook. Proposals should include the provision or retention of adequate garden space and allow through routes for pedestrians, cyclists and vehicles (ie no physical barriers)."

Marden Draft Neighbourhood Plan Policy BE3 - Sustainable Construction states: "All development

must be based upon the principles of sustainable construction and accord with the most up-to-date guidance and best practice. Support will be given to development that provides or incorporates low or zero carbon technologies providing development confirms with other policies in the plan."

Marden Draft Neighbourhood Plan Policy A1 - Community Facilities states: "Development proposals that help to sustain the existing community facilities and create new facilities either directly through developer contributions or indirectly by encouraging local spending will be supported provided development conforms with other policies in the plan. Any new development should prioritise dedicated youth facilities."

Marden Draft Neighbourhood Plan Open Space section states: "Marden is fortunate to have a number of public open spaces as well as a variety of sport and recreational amenities. Open space, be it in the form of streets, parks, squares or open fields, is critical to the well-being of residents. The importance of these areas is expected to be recognised by any new development and new spaces to be carefully designed to complement those that already exist within the village. As one resident stated, "Our young people need space to grow as well as our village"."

Marden Draft Neighbourhood Plan Policy A2 - Open Space states: "All major development should provide areas of amenity, recreation, woodland, ponds or other water features and these to be retained for community use. Links should be provided between areas of open space, community facilities and the public rights of way network, with management plans confirming operating responsibilities put in place to safeguard the future retention of these areas."

Marden Draft Neighbourhood Plan Policy A4 - Healthcare Facilities states: "Support will be given to proposals that help provide the Health Care Authority to maintain and enhance existing healthcare provision and encourage the expansion of health, wellbeing and social care services in Marden through extended and/or new healthcare facilities."

TQ23 – How can the Local Plan Review best manage flood risk whilst still achieving the growth that is needed?

Through long term planning - eg investment in the Leigh Barrier etc.

Good design.

Use of SUDs with long term management strategies.

Create wetlands and reed beds to act as a natural attenuation and attract wildlife (such as Hall's Scheme in Underlyn Lane, Marden).

River Beult is in the Environment Agency Action Plan - MBC to have regard when viewing planning applications.

Lost opportunity to not implement fully the Act to make LLFA responsible for SUDs ongoing maintenance.

Marden Draft Neighbourhood Plan Policy NE1 - Surface Water Management states: "Support will be given to development proposals that include appropriate sustainable surface water control systems designed to deliver efficient, clean water handling as well as wildlife and amenity

benefits. Schemes must be accompanied by a detailed management plan confirming operating responsibilities to ensure the permanent management and maintenance of all elements of the schemes to maximise local benefits."

Marden Draft Neighbourhood Plan Surface Water Management Section Further Actions states: "(1) All partners to take forward the recommendations of KCC's Marden Surface Water Management Plan 2017, and revisions; (2) Environment Agency to confirm whether all or part of Marden should be designated a Critical Drainage Area; and (3) All landowners with riparian responsibilities to ensure existing ditches are fit for purpose and maintained as such."

TQ24 – How can the Local Plan Review best plan for the protection and enhancement of the borough's environmental assets whilst still achieving the growth that is needed?

Through long term planning and investment.

Planning policy to insist on environmental improvements in all developments.

Enhance not just maintain or preserve.

Government consultation "Draft Environment Principles and Governance Bill 2018" provides details on uplift of 10% benefit.

Maidstone Air Quality Management Area should be a major consideration

Clarification of what areas are covered by the "Low Weald". MPC submits that for Marden, from the evidence below, should be included as a landscape of local value.

The National Character Profile Area document produced by Natural England in 2013 includes Marden in the Low Weald

<http://publications.naturalengland.org.uk/publication/12332031?category=587130>

The Maidstone Landscape Character Assessment 2012 updated July 2013 includes Marden under the Staplehurst Low Weald

[http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20\(July%202013\).pdf](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf)

Maidstone Landscape Capacity Study: Sensitivity Assessment January 2015 includes Marden under the Staplehurst Low Weald

[http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0007/90475/Maidstone-Landscape-Capacity-Study-Sensitivity-Assessment-January-2015.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0007/90475/Maidstone-Landscape-Capacity-Study-Sensitivity-Assessment-January-2015.pdf)

However whilst the adopted Maidstone Local Plan 2017 makes specific reference to Landscapes of Local Value at 4.113 Marden (Staplehurst Low Weald) is not included as a Landscape of Local Value.

<http://services.maidstone.gov.uk/docs/October%202017%20Adopted%20Local%20Plan.pdf>  
<http://maidstone.addresscafe.com/app/exploreit/Default2017.aspx>

Due consideration should be given to the possible designation of the Greensand Ridge as an AONB

Marden Draft Neighbourhood Plan Policy NE2 - Water Quality states: "Development proposals that seek to protect the water quality downstream by strict controls on the potential release of contaminants, both during construction and in use will be supported. Sustainable drainage networks should be designed for ease of long term maintenance, as well as lifetime efficiency. Best sustainable on-site use should be made of materials arising from maintenance."

Marden Draft Neighbourhood Plan Policy NE4 - Biodiversity and Habitats states: "Owing to the unique setting of Marden in its surrounding landscape all new development is expected to support actively the aims of the Kent Biodiversity Strategy, to protect Priority Habitats and, where possible, contribution to the Biodiversity Opportunity Areas. A biodiversity net gain philosophy should be implemented so that any habitat or species loss is replaced elsewhere on-site, in excess of the amount originally lost. Local off-site re-creation is viewed as a last resort but the net gain principle would apply to ensure there is a positive impact from the new works."

Marden Draft Neighbourhood Plan Landscape Planting Section states: "All opportunities should be taken to reduce existing infestations of non-native invasive species, control pernicious weeds and prevent the spread or import of plant diseases."

Marden Draft Neighbourhood Plan Policy NE5 - Landscape Planting states: "New landscape planting in Marden must be selected from native species of local provenance for visual continuity and to maintain the natural rhythms of the vegetation in the surrounding area. Priority should be given to species that provide food and shelter to wildlife. Adequate space must be allocated on the Site Plan to allow the planting to reach maturity without detriment to the amenity of the development such as encroaching on neighbouring property, excessive shading of gardens or interruption of external views."

Marden Draft Neighbourhood Plan Policy NE6 - Soil Conservation states: "Development proposals should demonstrate sustainable on-site soil management and minimise the import of subsoil and topsoil and the export of an excavated grounds materials."

TQ25 – How can the Local Plan Review best plan for the conservation and enhancement of the borough's heritage assets whilst still achieving the growth that is needed?

As above - although this is controlled by national legislation.

MBC to review all existing Conservation Areas and consider the introduction of further Conservation Areas in conjunction with Parish Councils and community groups etc.

Employ an in-house Conservation/Archaeology Officer.

Marden Draft Neighbourhood Plan Policy BE1 - Local Character states: "Development proposals should be designed to protect the fabric and setting of any designated and non-designated heritage asset and respect and enhance the existing character of the village. Development must be both visually and functionally sympathetic to the existing styles and materials - examples of which are illustrated in this plan, in order to maintain and enhance Marden's sense of place."

Marden Draft Neighbourhood Plan Local Character Further Actions states: "Marden Parish Council to lobby MBC to undertake a Conservation Area Appraisal and Management Plan for Marden."

TQ26 – How can the Local Plan Review best plan for the protection and enhancement of the borough’s biodiversity whilst still achieving the growth that is needed?

As Q24

Broaden to not only to include statutory protected species but those species recognised by RSPB as endangered species.

SPAs to be included.

SPAs (Special Protection Areas). Planning is usually only interested in protected species (GCN, bat etc) however SPAs relate to a large number of threatened species listed in the “Birds Directive” Annex 1 (193 species). To include SPAs would give greater protection for wildlife.

TQ27 – How can the Local Plan Review best plan for an overall improvement in air quality in the Maidstone Air Quality Management Area, and manage air quality elsewhere, whilst still achieving the growth that is needed?

Give air quality a priority in decision making.

CIL could be linked to levels of air quality and contributions.

Prioritise green spaces to help mitigate air quality.

Find a way to remove/reduce standing traffic.

TQ28 – How can the Local Plan Review best reduce the generation of carbon emissions and mitigate for the effects of climate change whilst still achieving the growth that is needed?

MBC have agreed a climate change emergency but now need to implement improvements, take it forward, with a dedicated team/officer and to be fully funded.

Net gain in biodiversity and carbon.

Reintroduction of Code for Sustainable Homes or similar should be through both the planning system and building regulations regime.

Electric driven public transport/charging points.

Marden Draft Neighbourhood Plan Sustainable Construction section states: "The Marden Neighbourhood Plan recognises and fully supports developments which show high levels of sustainability. Residents are only too aware of surface water management and quality issues in the parish - see policies NE1 and NE2. Similarly, the installation of small-scale renewable energy schemes at both domestic and commercial level is encouraged. There are an increasing number of local examples of good practice. New buildings can also incorporate simple measures to encourage wildlife habitats. This includes the provision of bat and nest boxes and bee bricks for example." "The use of rainwater harvesting is recommended for all new development. The use of solar thermal technology, ground and air source heat pumps and heat recovery systems are

encouraged, with the ultimate aim of achieving minimal energy use through the use of passive house design."

Marden Draft Neighbourhood Plan Policy BE3 - Sustainable Construction states: "All development must be based upon the principles of sustainable construction and accord with the most up-to-date guidance and best practice. Support will be given to development that provides or incorporates low or zero carbon technologies providing development confirms with other policies in the plan."

Marden Draft Neighbourhood Plan Policy In2 - Sustainable Travel states: "Support will be given to developments designed to maximise travel on foot and by cycle and that provide direct links to village facilities and public transport services via off-road and lightly trafficked routes, or through improvements for non-motorised users on busier existing routes. Developments should not hinder existing walking and cycling routes unless a convenient alternative route is provided. Major sites should be designed to provide through routes for pedestrians and cyclists where this would help improve non-vehicular access from adjacent housing or business premises and to facilitate links with any nearby public rights of way or open space."

Marden Draft Neighbourhood Plan Policy NE4 - Biodiversity and Habitats states: "Owing to the unique setting of Marden in its surrounding landscape all new development is expected to support actively the aims of the Kent Biodiversity Strategy, to protect Priority Habitats and, where possible, contribution to the Biodiversity Opportunity Areas. A biodiversity net gain philosophy should be implemented so that any habitat or species loss is replaced elsewhere on-site, in excess of the amount originally lost. Local off-site re-creation is viewed as a last resort but the net gain principle would apply to ensure there is a positive impact from the new works."

Marden Draft Neighbourhood Plan Policy A2 - Open Space states: "All major development should provide areas of amenity, recreation, woodland, ponds or other water features and these to be retained for community use. Links should be provided between areas of open space, community facilities and the public rights of way network, with management plans confirming operating responsibilities put in place to safeguard the future retention of these areas."

#### TQ29 – How can the Local Plan Review best provide for open space in new development?

Major spatial planning - overall master plan for open space produced by MBC and not down to the developer to provide.

On-site provision of green space.

Enhanced and increased public rights of way to be widened to include land either side to create green corridor links.

Green space to also be made available around commercial/industrial buildings.

Marden Draft Neighbourhood Plan Open Space section states: The importance of open space was identified in both the Marden Design Statement 2001 and the Marden Community Plan 2007. More recently, at the Marden Neighbourhood Plan open days, residents again identified the importance of open space. Local people are best placed to help decide what is needed in their environment and should have greater community involvement in the management of green and blue facilities. The Marden Neighbourhood Plan, therefore, seeks to maintain and improve the existing and valued areas of open space and to encourage the provision of additional areas. This

will ensure Marden is a greener, healthier, more attractive and welcoming village." "The NPPF requires planning policy to be based on robust and up-to-date assessments of the needs for open space, and sports and recreational facilities. National policy also encourages the creation and enhancement of a network of open spaces and natural habitats and the protection of existing areas of open space and landscapes."

Marden Draft Neighbourhood Plan Policy A2 - Open Space states: "All major development should provide areas of amenity, recreation, woodland, ponds or other water features and these to be retained for community use. Links should be provided between areas of open space, community facilities and the public rights of way network, with management plans confirming operating responsibilities put in place to safeguard the future retention of these areas."

TQ30 – What community facilities do you consider are the most important to a successful new development?

Dependant on scale and site specific.

Borough-wide: expansion to crematoria/cemeteries

TQ31 – Have we identified the extent of potential changes to the adopted Local Plan correctly? What alternative or additional ones do you suggest and why?

Waiting to see what strategy MBC will recommend and await further consultation stages.