

Annex A - Marden Parish Council response to the MBC Regulation 18b Preferred Approach Policy LPRSA295 Land North of Copper Lane Marden

		NPPF paragraph	Local Plan Policy	Marden Neighbourhood Plan
Conclusion and summary	<p>Site 295 is considered unsustainable and unsuitable for housing development because.</p> <ul style="list-style-type: none"> • Pedestrian connectivity with the village centre is poor • Vehicular access into and out of the site, and through and around the village, would cause significant impacts at a number of locations • The A229 to Maidstone is already heavily congested, and connections to other large towns and the motorway / trunk road network are along narrow, minor country roads • The visual impact of development on this elevated, sloping site will inevitably be far reaching, especially in a wide arc stretching from the southeast to the west • There are limited employment opportunities in Marden, with both car and public transport options for those seeking to work in Maidstone likely to remain poor • Commuting to London by train is likely to be the only option for many, but services are already full during peak periods – with no prospect of increased capacity – and this can only worsen with further housing developments • Access to retail and leisure facilities is constrained in a similar way to employment opportunities • The water, sewerage and electrical systems in Marden are already under great strain, even without any further housing developments • The environmental and ecological impacts would cause irreversible harm • Adversely affects the amenity of the area 	20, 78, 84, 91, 92, 94, 98, 102 to 104, 108, 109, 112, 127, 149, 155, 158, 163, 170, 175, 181, 182, 189 to 183	SP5, SP9, SP17, SP18, SP23, DM1, DM2, DM3, DM4, DM6, DM20, DM21, DM30, ID1	NE1, NE3, NE4, NE5, BE1, In1, In2, In3, In4, A1, A3, A4, E1, E2

Comments relating to conditions in MBC Preferred Approaches document

Access, Highways and Transportation	<ul style="list-style-type: none"> • Widening Copper Lane is not feasible. It is a narrow, single track country lane, with ditches and ponds on both sides of the road. It is subject to flooding (<i>see Figure 5</i>). • It is not feasible for Copper Lane to be used a bus route for the reasons above plus <ul style="list-style-type: none"> ○ At the northern end it joins Howland Road which is not suitable as a bus route due the road constraints at Rose and Crown Cottages. • Widening surrounding roads is not feasible <ul style="list-style-type: none"> ○ Thorn Road and Plain Road are country lanes, with ditches and hedgerows and private land on either side. It would not be cost effective to purchase the land required to widen these roads. ○ Albion Road is residential with private land on both sides of the road. It would not be cost effective to purchase land required to widen this road. • Under the ‘Access to Public Transportation & Services’ assessment, the Strategic Land Availability Assessment (SLAA) records (with added emphasis): <ul style="list-style-type: none"> ○ <i>“Required mitigation measures unfeasible due to the requirement for 3rd party land, or the requirement to remove existing resident parking (with no apparent alternative) on order to achieve suitable road widths. Site recommended as unsuitable on access grounds.”</i> ○ <i>“Required mitigation unfeasible due to the scale of the site and an insufficient number of units to support a new bus route and the requirement for 3rd party land. Site recommended as unsuitable on sustainability grounds.”</i> • Other conditions Marden Parish Council would prefer to see added <ul style="list-style-type: none"> ○ Pedestrian only access to Copper Lane, no vehicular access ○ Provision of a gateway feature at the 30mph limit on Thorn Road ○ The road junction at Plain Road and Thorn Road to be one way around the triangle ○ Provision of a pedestrian island in the centre of High Street and Albion Road junction
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Comments relating to the site

Site Reference: 295	North of Copper Lane	Policy considerations		
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Physical and social connectivity	<ul style="list-style-type: none"> • There are limited pedestrian links to Marden. • Copper Lane is a single-track country lane with no prospect of a footway to link to Thorn Road or Howland Road, and no footways on Thorn Road, Albion Road or Howland Road in the vicinity of the site (see Figure 1). • There are no public footpaths across the site and the minor roads in the vicinity of the site are narrow and unlit. • There is no bus service along Copper Lane, Howland Road or Thorn Road. • The site is not adjacent to the current settlement. 	78, 84, 91, 98, 104, 182	SP5, SP9, SP17, SP23, DM1, DM21	BE1, In2
Highway considerations	<ul style="list-style-type: none"> • As noted above, Copper Lane is a single-track country lane, with mature trees, established hedgerows, ditches (some deep) and numerous ponds on either side resulting in little prospect of widening it to provide a two-way road (see Figure 1). • There would be significant impacts from additional traffic at the junctions at either end of the lane onto Thorn Road and Howland Road, especially as these are adjacent to substandard bends with restricted sightlines (see Figure 2). • Howland Road is constrained by the blind bend at Rose and Crown Cottages. • The only other option for access to the site would be via Site 314 using Albion Road, but that site is itself considered unsuitable for housing development (see separate assessment). • The capacity of Albion Road and the length of Howland Road within the village envelope is heavily constrained by on-street parking. • For traffic heading to or from the Maidstone, Staplehurst or Yalding directions, there would be significant impacts from additional traffic at the Albion Road / High Street / Howland Road T-junction, at the High Street / B2079 Maidstone Road T-junction and the length of B2079 within the village envelope used for on-street parking. • The A229 to the north of Linton and into Maidstone is also inadequate and already heavily congested, and constraints mean that the planned improvements to the Wheatsheaf roundabout and Linton Crossroads are unlikely to be sufficient to accommodate the additional traffic over the longer term. • Road connections to the west of Marden to amongst others Paddock Wood, Tonbridge, Tunbridge Wells and Kings Hill are along narrow, minor country roads. Road connections to the east of Staplehurst towards Headcorn and Ashford are equally poor. • Connectivity to the motorway and trunk road network, in whichever direction, is slow and poor along country lanes. • For traffic heading to or from the Goudhurst, Paddock Wood, Tonbridge or Tunbridge Wells directions, there would be significant impacts from additional traffic at the Albion Road / Plain Road / Thorn Road T-junction and at the Thorn Road / B2079 Goudhurst Road / Shephurst Lane crossroads. • Under the 'Access to Public Transportation & Services' assessment, the Strategic Land Availability Assessment (SLAA) records (with added emphasis): <ul style="list-style-type: none"> ○ "Required mitigation measures unfeasible due to the requirement for 3rd party land, or the requirement to remove existing resident parking (with no apparent alternative) on order to achieve suitable road widths. Site recommended as unsuitable on access grounds." ○ "Required mitigation unfeasible due to the scale of the site and an insufficient number of units to support a new bus route and the requirement for 3rd party land. Site recommended as unsuitable on sustainability grounds." 	84, 102 to 104, 108, 109, 181	SP23, DM1, DM6, DM21, DM30	In2, In3

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Character and setting	<ul style="list-style-type: none"> The site is on an elevated, sloping, position and visible across the open fields for some miles, especially in a wide arc stretching from the southeast to the west, which means that any development could not realistically be screened and therefore will inevitably have a harmful impact on the surrounding countryside (see Figures 3 and 4). Even were it feasible, any widening of Copper Lane would result in a significant loss of mature trees, established hedgerows, ditches and numerous ponds on either side, resulting in fundamental impacts to its character and distinctiveness as a 'quiet lane' (see Figures 1 and 3). Under the 'Landscape Character' assessment in the SLAA, it is stated that the <i>"The Landscape Character Assessment identifies that the site is within the Staplehurst Low Weald landscape character area, which forms a part of the Low Weald landscape character type. The overall condition of the area is considered to be Good, and the sensitivity to be High, with an overall recommendation to Conserve."</i> 	127, 170	SP17, SP18, DM1, DM2, DM3, DM30	NE3, NE5
Heritage	<ul style="list-style-type: none"> There are three Grade II listed buildings in close proximity to the site: <ul style="list-style-type: none"> Jewell House / Bishop House Stone Pit Farmhouse Barn north west of Stone Pit Farmhouse Under the 'Archaeology' assessment in the SLAA, it is recorded that there is <i>"potential for Bronze Age and later prehistoric remains as well as post medieval agrarian heritage remains."</i> 	189 to 193	DM4	BE1
Fluvial and surface water flooding	<ul style="list-style-type: none"> The Environment Agency Surface Water Flood Map shows evidence of the surface water flooding on site including the road network, Copper Lane, Howland Road and Thorn Road – proven on the ground (see Figure 5). Under the 'Drainage' assessment in the SLAA, it is recorded that <i>"No watercourses showing up from mapping however that does not mean they are not present. Further investigation needed as to method of discharge."</i> 	155, 158, 163	DM1	NE1
Ecological considerations	<ul style="list-style-type: none"> Residents have reported evidence of RSPB red listed species (yellowhammers, woodpeckers, and fieldfares) on the site. Natural England survey records show great crested newts present in the Copper Lane area. 	175	DM1, DM3	NE4
Education and health	<ul style="list-style-type: none"> There are very limited pedestrian links to Marden Primary School, Marden Medical Centre or Marden Dental Surgery, and there are already difficulties reaching Maidstone and Pembury Hospitals and the county town's secondary schools, especially during peak hours and on public transport. Any large-scale development south of the Greensand Ridge can only worsen the existing situation and prove increasingly unattractive to potential residents of the site when combined with the 'baseline' development allocations in the current local plan. 	20, 78, 84, 91, 94	SP5, SP9, DM1, DM20	A1, A3, A4
Employment	<ul style="list-style-type: none"> There are limited local employment opportunities in Marden, and as noted above both car and public transport options for those seeking to work in Maidstone are likely to remain poor. Some employment opportunities may exist in Tonbridge, Tunbridge Wells or Ashford, but commuting to London by train is likely to be the only choice for many. Marden railway station is on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near 'standing room only' during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached. Other large-scale housing developments in Staplehurst, Headcorn, Ashford and East Kent will also be putting increasing pressure on train capacity in future years. Marden station already has severe parking problems in a very constrained area. 	78, 84	SP5, SP9, DM1	In4, E1

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Retail and Leisure	<ul style="list-style-type: none"> As noted above, there is poor connectivity with the existing retail and leisure options available to residents of Marden. Facilities in the town of Maidstone would be similarly difficult for potential residents of the site to access except by car, and even then, increasingly so during peak periods when the combined impacts of current and future developments in the locality add to existing pressures. However, this site is also unlikely to have the 'critical mass' to support any retail or leisure options within the development itself. 	78, 84, 92, 182	SP5, SP9, DM1, DM20	A1, E2
Utilities	<ul style="list-style-type: none"> Electricity: <ul style="list-style-type: none"> Marden experiences frequent power cuts during thunderstorms. Impact of additional demand on the existing electrical supply network Gas: No known issues. Water: South East Water has an ongoing programme to renew and strengthen its existing network, but it is not clear whether this will offer the capacity to deal with the individual and cumulative impacts of additional large-scale housing developments. Sewers: The sewerage system in Marden was already under great strain, even before the recently completed housing developments and those currently being completed. Frequent problems occur at the Roughlands pumping station which connects the village with the Horsmonden wastewater treatment works. The existing sewer network also surcharges during periods of heavy rainfall, causing significant health concerns. All these problems would be exacerbated by any further large-scale housing development. Landline: No known issues. Broadband: Ultrafast fibre broadband is becoming available in parts of Marden, but bandwidth problems are common with standard and superfast broadband. Mobile: No 5G coverage in Marden. 4G coverage is variable, depending on network and exact location. 	112, 149	DM1, ID1	In1



Figure 1 - View looking east along Copper Lane showing rural character as a 'quiet line' line by mature trees and established hedges



Figure 2 - View looking north along Thorn Road towards the Albion Road / Plain Road junction, illustrated the restricted sightlines and lack of footways



Figure 3 - View looking north from Copper Lane across Site 295 illustrating one of the many ponds, with Site 314 and the Russet Grove development on the skyline beyond



Figure 4 - View looking north at entrance to Site 295 from Copper Lane, with Site 314 and the Russet Grove development on the skyline beyond



Figure 5 – Various views of repeated recent flooding in Copper Lane – December 2019, February 2020, March 2020 and November 2020