

Staplehurst Parish Council (SPC) commends Maidstone Borough Council (MBC) for dealing with a 40% increase in housing targets and aiming to complete its Local Plan Review in a time frame that avoids being allocated even more housing in the immediate future by the Government's new formula for housing need.

We remind you that we are one of only six parish councils (we were the first) that have a Neighbourhood Plan which our residents voted overwhelmingly to support and which we will use to inform our opinion. We are in the process of reviewing our Neighbourhood Plan and are working hard to produce a Design Code.

SPC responded to the Call for Sites at the beginning of 2020, following a public meeting held about future housing in Staplehurst, with a strong "No" to all the sites, except for employment, for many valid policy reasons. (see Appendices A & B). SPC also responded in detail to Reg.18b. (see Appendix C).

SPC notes that MBC has added one more site in addition to those in Reg. 18b, but our stance remains the same in that our Parish cannot absorb any more housing. Our windfall housing sites and G&T pitches continue to rise and this contribution to the MBC's 5-year Housing supply must be taken into account. (see Appendix D).

Staplehurst already has 700 homes being built out on three sites allocated in the 2017 MBC Local Plan. With only about half of these homes finished, the traffic has increased dramatically, especially at the crossroads. When planning permission was granted for two of these sites it was decided that any improvement at this junction was not a viable option. A recent joint MBC/KCC investigation proved that traffic through our crossroads was at a maximum and that no additional housing could be accommodated as there was no viable means to improve this historic area. This is important evidence that Staplehurst cannot be allocated any sites that have to access this crossroads to travel to essential services and employment. Residents are experiencing daily disruption as a result of development on our sites, such as traffic issues, light and noise pollution, poor air quality and wear and tear to our community's rural lanes.

We appreciate that MBC has to allocate housing numbers, but we also have to consider the future of our current residents alongside the needs of potential new residents. We also note that KCC and MBC have declared a climate emergency and further housing would seem to be in direct conflict with that position.

Staplehurst has accommodated a large number of windfall sites which should be included in our 'numbers', with small pockets of development, homes being demolished and replaced with more houses, home conversions into flats, commercial sites demolished and replaced with housing, extensions built and subsequently sub-divided, and numerous barns and agricultural dwellings being changed to residential use. Our G & T sites have been subject to many sub-divisions of plots, which have considerably added to our resident numbers and should therefore be taken into account (see appendix D). This increased residential population is putting an enormous strain on the creaking infrastructure of Staplehurst (poor condition of rural roads, lack of permanent doctors, poor variety of non-food shops, lack of secondary education facilities nearby, surface water issues, inadequate public car parking in the centre of the village, poor bus service, inadequate foul sewerage system and limited sports opportunities at present with no sports hall). Residents have to travel to access many facilities. The proposed closure of the High Weald Academy Secondary School would exacerbate this.

The A229 through Staplehurst will also be greatly impacted by the Tunbridge Wells Local Plan which is allocating large numbers of housing to its satellite communities to the south of our village. This will have a huge impact on this primary route going through our village and must be taken into account if delivering more growth to Staplehurst. SPC has asked Cranbrook and Sissinghurst Parish Council to review the

number of residents which travel to access the railway station in Staplehurst when formulating its Neighbourhood plan.

The Two “preferred sites” for Staplehurst generating a further 127 housing units are still in Regulation 19 with some additional changes, together with an additional site added to the Land at Home Farm.

Land at Home Farm 114

SPC does not support this site for the following reasons: -

1 SPC notes that an extra parcel of land has been added to this allocation now known as site B. This means more of our open countryside is allocated for housing. This parcel of land is extremely wet for most of the year and has a public footpath going across it, yet there is no mention of this.

2 These sites are too far from public transport, schools, services and shops making them unsustainable locations, totally dependent on the car (against Policies SP23 and new policy LPRSP15, DM1, Building for life 12 and the NPPF). This will increase the carbon footprint and goes against the very serious issue of dealing with the world’s Climate Emergency.

3 We note that the provision of a new bus route to make this allocation viable has been removed from the site details. These sites are more than 400m from a bus-stop and so access to alternative forms of transport is not met, going against current policies.

4 These sites will generate more traffic to the crossroads and now a contribution to improve this area has also been removed in Reg 19. Many ideas for these crossroads have been put forward and been abandoned. The significant changes previously suggested to improve the crossroads would totally destroy the rural character of the village scene (monument, Chestnut Avenue, historical housing) and be financially unviable. Recently, MBC and Kent did a joint investigation into the traffic going through these crossroads on the A229 and declared this area at capacity with no means to remedy this. The joint research declared that no more housing should be built that relied on the crossroads to access services and employment. However, we are now being allocated further sites on the Headcorn Road. We also need to point out that the Tunbridge Wells Local Plan is planning to build hundreds of homes to the south of Staplehurst which will generate a huge increase in traffic through Staplehurst accessing our station, supermarket and the County town of Maidstone. Our historic crossroads will not be able to cope, causing further grid-lock at peak times.

5 These sites would also generate traffic over the dangerous Hawkenbury River Bridge with no provision for improvements to highway safety here. This is a priority on the Highways Improvement Plans for both Headcorn and Staplehurst. Undesirable rat runs in the country lanes in this area will also increase.

6 Site A is planned to be another cul-de-sac estate which is against the Staplehurst Neighbourhood Plan (SNP) Objective 3 and Building for life 12. All new housing should be plugged in to the existing built-up area and have a series of well-connected streets.

7 These sites form part of a Landscape of Local Value, being part of Staplehurst Low Weald (against MBC Policy SP17 and new policy LPRSP9).

8 MBC acknowledges that the northern part of the site is in Flood Zone 2 and so not suitable for development. Building on the rest of this site will exacerbate the surface water situation with its high water-table (against MBC Policy DM1). Staplehurst, like many other areas, is experiencing unprecedented levels of flooding. (see Appendix E)

9 Pile Lane could be utilised as the access road rather than the Headcorn Road. This would enhance safety by focusing all movements into the existing Great Threads junction rather than creating yet another potential accident black-spot and destroying the ancient hedgerow that characterise this busy rural lane. The second access road could be at the northern end of Pile Lane, just as Little Threads does from the Redrow estate. Pedestrians should be provided for within the estates rather than along Pile Lane. A pedestrian access from the Home Farm to the Redrow estates should be built across the ditches to facilitate connectivity.

Even though this area of the Headcorn Road now has a 30mph speed limit, a large proportion of vehicles drive in excess of this. SPC has commissioned a week-long road traffic survey in the Headcorn Road, due to be carried out in November 2021. (see Appendix E). SPC thought that the Bovis Estate was to provide a Puffin crossing, but the condition was only for dropped kerbs. There is no safe designated place for a proper pedestrian crossing to connect with the housing on the south side in this site allocation.

SPC expects all homes on sites to be carbon neutral which can be achieved by strong policies elsewhere in the revised Local Plan.

For all of the above reasons SPC objects to the site allocations A and B at Home Farm and wishes to speak on the 'Land at Home Farm' when the Planning Inspector considers this during the Hearing of the Local Plan Review.

Land East of Lodge Road 066

This site has allocation for commercial use. SNP Policy H6 states that mixed use on this site could provide more employment with residential units. The parish council wishes to see 'live/work' units as rural courtyard employment areas with living accommodation above. SPC was represented at the Inspection of the 2017 MBC Local Plan and put a strong case for this to be accepted. Sadly, the Inspector chose to support MBC's allocation as a purely business site. SPC supports MBC's proposal of a mixed-use allocation. However, we want this development to be more imaginative and innovative in its a mix of housing and business use as per the suggestions in our Neighbourhood Plan policy H6.

SPC is also disappointed to see that most of this site is now allocated for housing (3.8ha) with only 0.3 allocated for employment.

SPC supports the policy stating that vehicular access shall be provided to both Lodge Road and the adjacent residential development (Dicken's Gate).

It should be noted that SPC only supports this allocation if the Lodge Road 'vehicle link' to the adjacent site (Dicken's Gate) is built (SNP Policy H6). **This is considered a critical point.** SPC maintains that there is a benefit to the community through providing an alternative route for light traffic which is supported in our Neighbourhood Plan. SPC does not want to provide access along this road for heavy goods vehicles and is pleased to see that the developer needs to work with Kent Highways to manage the traffic in ways that will protect current and future residents.

The SNP Objective 3 is to avoid any more cul-de-sac estates.

SPC would expect all new buildings on this site to be 'carbon neutral'.

SPC would like to suggest that this site is built-out with smaller units (1/2 bed) both in the market and affordable housing allocations. Staplehurst already has a large proportion of larger, expensive dwellings and smaller units on this site would help our younger people get onto the housing ladder and give

opportunities for older people to downsize. This suggestion could increase the housing density on the Lodge Road site.

Employment

SPC is aware of the lack of employment offered across the borough in the recent 'Call for Sites.' Brattle Farm (214) did offer an employment and residential mix. MBC may wish to re-visit this site regarding the employment aspect, but not housing here as it is in an unsustainable location and so would be totally dependent on the car.

SPC supports Policy LPRSP11c which protects our local shops.

In summary, the lack of infrastructure as previously mentioned (parking, mixture of shops, good public transport, medical, education, some sports facilities, drainage, sewage) means SPC currently cannot support more housing in Staplehurst. Our residents continue to experience many problems related to these, even on the new developments, and therefore it is unreasonable for SPC to support further development until these issues are resolved. Regarding the crossroads in the middle of our village we feel every means of improvement here have been explored and rejected. This is therefore a major constraint on any future development here. Added to this, **the A229 has now been declared the most unsafe rural road in the country**. This must be taken seriously and be an important material consideration in your Local Plan Review and yet there is no mention of this anywhere in your document which SPC considers is a serious omission.

OTHER POLICIES IN LOCAL PLAN REVIEW

SPC appreciates the strengthening and improvements to many of the existing policies in the current Local Plan. However, it wishes to comments on further changes to the following policies in Reg.19.

Policy LPRSP10 (B) Affordable Housing

SPC is disappointed to see that the affordable housing provision is still set as 40% of new-builds of ten or more houses across most of the Borough.

Staplehurst, being on the southern edge of the borough, is too far from Maidstone with all of its essential facilities. Our number 5 bus service is unreliable and expensive.

Families living in the rented sector of the affordable units often come from some distance away. These people feel isolated and lack the support of their family and friends. SPC hoped that this housing would be occupied by local people who knew the area well. Building this quantity of units has far-outstripped our local needs.

SPC would like the figure for affordable housing to be reduced to a more realistic target of 20% with at least half of this figure to be ring-fenced for local people.

Policy LPRSP14(C) Climate Change

In view of the very serious climate emergency this is a vital policy, but it needs strengthening.

Section 2 and 3 of this policy contain the words 'encourage' developers. This is too weak and these 2 sections should be essential and not optional! Many developers will go down the route of maximum profit, unless they are not allowed to build without appropriate measures to mitigate their effect on climate change.

Policy LPRQ&D1 Sustainable Design

Throughout this policy you use the word 'should' which means developers do not have to achieve your aims of 'Sustainable Design'. With the Climate Change Emergency SPC considers that all the 'shoulds' in this policy need replacing with 'musts'.

Policy LPRHou8 Gypsy, Traveller and Travelling Show people

SPC is pleased to see this comprehensive and improved policy compared to the existing Local Plan and Reg 18b. However, SPC feels it still needs strengthening by these additions.

Landscapes of Local Value must be protected and deemed unsuitable for G&T sites.

All G&T sites must be screened by native vegetation. High fences will not be acceptable for the purposes of screening.

Hard-standing must be limited to essential needs only.

There must be details of how foul and surface water is to be managed as well as details of connections to other services.

Accommodation must be consistent with a nomadic life.

When considering a new application for a G&T site in a Parish, the number of pitches already in that area must be a material consideration.

The Parish Council looks forward to speaking to the Inspector at the Hearing when he or she considers the two Staplehurst sites (066 and 114).

Attached

APPENDIX A SPC's Response in January 2020

APPENDIX B SPC's Presentation to residents in February 2020

APPENDIX C SPC's Response to Reg 18b in December 2020

APPENDIX D SPC's Windfall sites since 2015

APPENDIX E Home Farm annotated photographs showing flooding issues in the area

APPENDIX F Data summary from Headcorn Road Traffic Survey November 2021 - to follow