

BOUGHTON MALHERBE PARISH COUNCIL (BMPC)
Response to the Maidstone Borough Local Plan Review.
Regulation 19 Draft submission.

Introduction.

1. The BMPC has looked at the Local Plan documents on the Maidstone Borough Council website and the Local Plan Review Regulation 19 consultation and objects to the plan as a whole, and in particular to the proposals contained in Policies LPRSP4(A), 6(d), 10(A), 11, 12, 13, and 14(C).

2. The BMPC does not consider the Proposed Plan to be sound and in our opinion it does not legally comply with the National Planning Policy Framework (NPPF)

3. The BMPC is disappointed that Maidstone Borough Council (MBC) has added a part of our Parish area known as Bowley into the proposed Heathlands Garden Settlement scheme, mainly to the South of the M20 Motorway and High speed rail line without having the courtesy to bring it to our attention. This is a secluded and nature rich area which should be protected by MBC.

We assume that this addition to the Heathlands site is in accordance with the requirement under Policy LPRSP 4 A 7(a) to provide a new country park around the River Stour to the South of the site. A Country Park is quite different to the area as it is, and the wildlife, including several rare species will disappear if the proposal proceeds.

4. This response is largely concerning the impact of the proposed Heathlands Garden Settlement development upon our community, but should also be considered alongside the response of Lenham Borough Council which we fully endorse and support because whatever affects Lenham causes a ripple effect spreading out to all surrounding parishes that will be similarly affected.

Sustainability

5. The BMPC considers sustainability to be the most important consideration when reviewing Regulation 19, and any lack of sustainability will have a major impact on our Parish.

6. We do not consider the location chosen for Heathlands to be sustainable because it is in a little developed area of open countryside approximately half way between the village of Lenham and the town of Ashford, with Canterbury not much further away. There is no proper infrastructure and no services of any significance in the Heathlands area to support such a development. Everything required will have to be provided.

7. That part of our Parish known as The Homestead in Grafty Green was the first on the publicly available list as being ruled out for consideration under a call for sites within the Borough Plan on the grounds of being unsustainable in the countryside, and makes a mockery of the choice of location for Heathlands which is next door and now partly within our Parish.

8. Headcorn Road which runs through our Parish and the Village of Grafty Green is the only route directly connecting Headcorn to Lenham and is already overloaded with traffic, particularly heavy Continental lorries using it as a short cut rat run to Tenterden, Tunbridge Wells, and beyond, despite other more suitable routes being available.

9. Headcorn Road extends into Lenham Road and is not particularly wide at any point, and has several very narrow stretches, one of which is single lane on Liverton Hill and is quite unsuitable for the density of traffic using it, Furthermore, speeds in the order of 70mph have been recorded on SIDs in the 30 mph section through Platts Heath, with estimated speeds in excess of 100 mph between Headcorn and Grafty Green.

10. The concern of BMPC is that Heathlands cannot be made sustainable and the knock on effect of this will be to make our Parish untenable and consequently it too will be unsustainable as a community with residents committed to permanent misery.

11. The towns of Maidstone, Ashford and Canterbury all have local essential services such as Hospitals, Surgeries, Chemists, Dentists, Schools, Shopping Malls, Supermarkets, Local shops, Out of town shopping, Recreational facilities such as Cinemas, Gyms, Sports Clubs and more.

12. Heathlands is the size of a small town with a proposed 5000 new houses, some classed as affordable, and facilities for 5000 jobs which are clearly only a wish without hardly any of the local essential services available in Maidstone, Ashford and Canterbury specified to the extent needed to support a Heathlands Garden Settlement community of 5000 houses whose occupancy must be at least 10,000 adults, and a high proportion of children.

13. Neither the Borough Plan as a whole, nor the specific proposals for Heathlands include any analysis that determines the extent of these essential services in 11 above that are needed to make the project sustainable, and the mention of them is so sparse that it is clear the provisions for them are totally inadequate. That inadequacy is clear to the man in the street without the need to look at essential analysis that is missing from the Borough proposals, even if Maidstone Borough Council cannot see it.

14. It is clear that the provision of space to generate 5000 new jobs within the 14 ha of dedicated land specified in conjunction with the 19,110 sq m of employment floor space specified in Policy LPRSP11(b)(3) would have to be split into the various categories of offices, light industrial, warehouse storage, servicing and public services facilities, all with their own external parking requirements. In addition, space is required for basic infrastructure such as public roads and pavements with services beneath them.

15. If all of the 19,110 sq m of space is dedicated to offices where the norm would provide perhaps 15 – 20 sq m of space per employee taking into account the necessary circulation spaces, toilet facilities, executive space, staircases and welfare needs etc it is unlikely that more than 1000 - 1300 jobs could be created. This ignores the necessary office staff car parking space presumably included within the 14 ha.

16. The aim of 5000 new jobs, with only say 1300 maximum in offices leaves a balance of 3700 jobs to be found in the remainder of the 14ha where the space requirements per employee are very much greater than in offices. For example, Light industrial and Warehousing requires very few employees within a huge area of space, probably a minimum of 100 times the space required for an office worker.

17. In short, the area of 14ha cannot accommodate the wish list of 5000 new jobs.

18. The above facts alone mean that the Heathlands proposals are not sustainable because most of the residents would have to seek work elsewhere, travelling to Maidstone, Ashford and Canterbury or to London by train. There will also be a proportion of those employed at Heathlands who will come in from elsewhere to work. The lack of proposed essential services as listed in 11 above will also mean that residents will have to travel to Maidstone, Ashford or Canterbury and perhaps further to access them.

19. A further failure of the proposals is that the essential infrastructure that is really necessary, particularly roads to offset the impact on the M20 Junction 8 and the A20 which will ripple into surrounding communities, will not be adequately provided. There have been no meaningful discussions with the rail authorities regarding the proposal for a new station to serve Heathlands or the possible closing of the existing Lenham station and transferring the facility to Heathlands which would mean that existing users of Lenham station would have to travel to the new station or transfer to Headcorn adding more unacceptable load onto Headcorn Road through Grafty Green.

20. We support the Lenham Parish Council submission that provides considerably more relevant analysis regarding the problems of infrastructure and employment delivery than is necessary for us to state our case, and we commend the Lenham response to MBC and the Inspector.

21. As can be seen, the proposals for a garden settlement at Heathlands will not only be unsustainable in terms of NPPF requirements and local policies, but also the additional traffic movements generated between Heathlands and the surrounding towns and villages and within Lenham will add to their unsustainability.

22. The number of vehicles on the road will increase annually and the additional traffic movements will create permanent frequent traffic chaos and slow moving congestions that will add considerably and unnecessarily to exhaust emissions in the short term until vehicles are all electric, which is contrary to National and Local policies designed to reduce emissions as soon as possible. It is not policy to increase emissions at any time in the immediate future which is exactly what the Heathlands proposals will do from the moment construction starts...

23. In our opinion the proposals for Heathlands are not fit for purpose because there is no proper published analysis to demonstrate either viability or sustainability to support them and the facts as we observe them do demonstrate that the proposals are neither viable nor sustainable.

24. The Lenham response correctly points out that the Sustainability Appraisal produced to support the Maidstone Borough Local Plan Review has concluded that

Heathlands performs less well against sustainability criteria than other more accessible locations within the Borough. MBC has regrettably ignored this advice. A more suitable site within the Borough should be chosen and if none exists the project should be abandoned before further monies are wasted.

25. We request that the Borough Plan incorporating the Heathlands Garden Settlement is abandoned on the grounds that it is neither sound, sustainable nor legally compliant with NPPF, but if it proceeds and is submitted to the Government Inspector for examination, we request the Inspector to reject the Plan as a whole, and if that is not possible to reject the proposals for the Heathlands Garden Settlement.

Boughton Malherbe Parish Council

Rev 1. 18 Nov 2021. Policy ref. correction on page 2

Rev 2. 20 Nov 2021. Further general revisions.